



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

May 14, 2019

Mr. Bradley E. Gentry
IWM Consulting Group, LLC
7428 Rockville Road
Indianapolis, Indiana 46214

Dear Mr. Gentry:

Re: Franklin Power Products, Inc. / Amphenol Corporation Facility
“Contained-in” Determination for Contaminated Soil
EPA ID No: IND044587848
Franklin, Johnson County

This letter is in response to your May 3, 2019, written request for a “contained-in” determination for 75 cubic yards remediation waste soil generated at the former Franklin Power Products, Inc./Amphenol Corporation facility site. The soil was generated during a construction activity replacing/repairing a collapsed sewer.

The site is located at 980 Hurricane Road, Franklin, Johnson County, Indiana.

Your request is for management options available based on contaminant concentrations in the contaminated soil meeting applicable industrial exit levels. IDEM specifies the applicable exit levels in the “contained-in” policy.

For purposes of this determination, the RCRA “contained-in” policy is applicable only to the aforementioned contaminated soil generated at the aforementioned site.

In the ‘contained-in’ request, it has been determined that the basis for managing the contaminated soil as F001, F005, F006, F007, F008, F009, U210, U226, and U228 listed hazardous waste codes would be potential releases from historic hazardous wastes that were generated at the site. The constituents of concern for aforementioned hazardous waste codes are:

- F001 The following spent halogenated solvents used in degreasing: tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures

Mr. Bradley E. Gentry
Page 2

- F005 The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and 2-nitropropane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, or F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures
- F006 Wastewater treatment sludge from electroplating operations except from the following processes: (1) sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum
 - Hazardous constituents: cadmium, hexavalent chromium, nickel, and cyanide (complexed)
- F007 Spent cyanide plating bath solutions from electroplating operations
 - Hazardous constituents: cyanide (salts)
- F008 Plating bath residues from the bottom of plating baths from electroplating operations where cyanides are used in the process
 - Hazardous constituents: cyanide (salts)
- F009 Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process
 - Hazardous constituents: cyanide (salts)
- U210 Tetrachloroethylene
- U226 1,1,1-Trichloroethane
- U228 Trichloroethylene

Additionally, the list of constituents would include the following F001 breakdown products and contaminants identified in the soil sample: cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE), 1,2,4-trimethylbenzene, vinyl chloride (VC), and xylene.

The site is currently remediated with supervision by the United States Environmental Protection Agency (US EPA). During previous remediation activities, multiple soil samplings and analyses have been conducted. As a result of the previous analytical findings, the US EPA has allowed the generator to limit the number of analytes when analyzing soil. That short list includes the following analytes: trichloroethylene (TCE), tetrachloroethylene (PCE), 1,1-dichloroethane (1,1-TCA), 1,2-dichloroethane (1,2-DCA), methylene chloride, cis-1,2-dichloroethene (cis-1,2-DCE), trans-1,2-dichloroethene (trans-1,2-DCE), 1,1,1-trichloroethane (1,1,1-TCA), and vinyl chloride (VC).

Based on the information provided by the requestor, compared with the established policy criteria, the following determination applies:

Mr. Bradley E. Gentry
Page 3

Current IDW Soil

There are 5 20-cubic yard rolloff containers (estimated 75-cubic yards) of F001/F005/F006/F007/F008/ F009 contaminated soil that was generated at the site and is on-site pending disposal.

Based on historical analytical data, the US EPA has allowed for the generator to analyze the soil for an abbreviated list of volatile organic compounds. In addition to that abbreviated list, IDEM required that each container of contaminated soil cuttings be sampled and analyzed to determine if the constituents related to the F006, F007, F008, and F009 listings (hexavalent chromium, nickel, zinc, and cyanide).

The contaminated soils appear to meet (did not exceed) the 2018 Federal Industrial/ Commercial Soil Direct Contact Soil Exposure Screening Levels (partial list below) for the constituents that were tested. These contaminated soils, meeting the screening levels and not exhibiting a hazardous waste characteristic, may be disposed in a permitted municipal solid waste landfill.

Constituent	2018 Federal Industrial/Commercial Soil Direct Contact Soil Exposure Screening Levels (mg/kg)	TCLP Maximum Concentration of Contaminants for the Toxicity Characteristic
cis-1,2-DCE	2300	N/A
trans-1,2-DCE	1700	N/A
PCE	170	0.7 ppm
TCE	19	0.5 ppm
Vinyl Chloride	17	0.2 ppm

This one time site-specific approval, for 75-cubic yards of contaminated soil generated from the repair of a sewer line, expires one (1) year from the date of this letter.

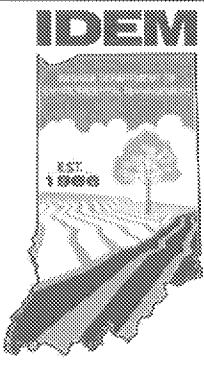
If you have any questions, please call John Naddy at 317-233-0404.

Sincerely,

Bruce Kizer, Branch Chief
Compliance and Response Branch
Office of Land Quality

Enclosures

cc: Mr. Kevin Davis, IDEM, OLQ, Remediation Branch
Ms. Carolyn Bury, US EPA, Region 5 (Bury.carolyn@Epa.gov)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT	STATUS: Pending	POLICY NUMBER: WASTE-0061	
AGENCY NONRULE POLICY DOCUMENT	AUTHORIZED:		
SUBJECT: "Contained-in Determination" Policy	SUPERSEDES: <i>List previous</i> WASTE-0052	ISSUING OFFICE(S): Office of Land Quality	
	ORIGINALLY EFFECTIVE: October 17, 2002	RENEWED/REVISED: January 27, 2014	

***Disclaimer:** This nonrule policy document (NPD) is being established by the Indiana Department of Environmental Management (IDEM) consistent with its authority in state law under the Indiana Code at IC 13-14-1-11.5. It is intended solely to provide guidance and shall be used in conjunction with applicable rules or laws. It does not replace applicable rules and laws, and if it conflicts with these rules or laws, the rules or laws shall control. Pursuant to IC 13-14-1-11.5, this policy will be available for public inspection for at least 45 days prior to presentation to the appropriate State Environmental Board, and may be put into effect by IDEM 30 days afterward. If the nonrule policy is presented to more than one board, it will be effective 30 days after presentation to the last. IDEM also will submit the policy to the Indiana Register for publication.*

1.0 PURPOSE

This guidance is intended to clarify the application of Resource Conservation and Recovery Act (RCRA) hazardous waste regulations to environmental media (i.e. soil and groundwater). Environmental media that has become mixed with "listed" hazardous wastes must be managed as hazardous waste when generated (e.g. exhumed for discard during remedial activities) because it contains "listed" hazardous waste(s). Federal hazardous waste rules 40 CFR 260 thru 270 are adopted by reference in 329 IAC 3.1 including the listing and characteristics of hazardous waste. Listed hazardous waste refers to solid wastes that have been determined to be hazardous waste by the US EPA based upon the specific process generating the waste or the specific source of the waste. Listed hazardous wastes are further described in 40 CFR 261 Subpart D as adopted by 329 IAC 3.1. Mixtures of listed hazardous waste and non-hazardous solid waste are considered to be RCRA hazardous waste per 40 CFR 261.3(a) (2) (iv). Characteristic hazardous waste refers to solid wastes that exhibit a "hazardous waste characteristic" such as 'ignitability', 'corrosivity', 'reactivity', and/or 'toxicity' as defined in 40 CFR 261 Subpart C as adopted by 329 IAC 3.1.

United States Environmental Protection Agency (US EPA) Regions and authorized states, including Indiana, may use site-specific, media-specific and contaminant-specific health-based criteria to determine when listed hazardous waste is not "contained-in" environmental media. If the concentration of the hazardous constituents in the environmental media fall below the specified health-based levels, the environmental media may be determined to no longer contain hazardous waste. Such a "contained-in determination" may be made by an authorized state before or after treatment of the contaminated environmental media and may include consideration of site-specific exposure pathways (e.g., potential for human exposure, soil permeability, leaching potential to groundwater). It should be noted that any treatment of hazardous waste may require a permit. For further information on this issue, see the IDEM guidance document *Treatment of Hazardous Waste On-site by Generators at*

<http://www.in.gov/idem/5026.htm>, or contact staff of the RCRA permit or compliance programs at IDEM.

Levels of contaminants of concern found in Table A-6, Screening Level Summary Table, of Appendix A, Screening Levels, of the *Remediation Closure Guide (RCG)*, represent an appropriate basis for making a risk based "contained-in determination" for soil and groundwater. Screening levels in Table A-6 were generated using conservative models and default assumptions concerning exposure and site conditions. If applicable, the environmental media must also meet all Land Disposal Restriction (LDR) treatment standards (including treatment of underlying hazardous constituents as defined at 40 CFR §268.2(i) for material that exhibits a characteristic in addition to containing a listed waste).

2.0 SCOPE

The scope of this NPD applies to environmental media (soil and groundwater) which is not characteristically hazardous but is subject to RCRA regulation by containing listed hazardous waste at concentrations below specific RCG screening levels.

Excavated nonhazardous soil, which is not subject to this policy, may be subject to solid waste regulations in 329 IAC 10 and/or policies as applicable.

This NPD is not meant to address naturally occurring contaminants of concern in soil or groundwater.

3.0 SUMMARY

The U.S. EPA "Contained-in Policy" states that soil and/or groundwater, which do not contain "listed" RCRA hazardous waste, and which is not otherwise hazardous, is not subject to RCRA regulation. A determination as to whether "listed" waste is "contained-in" soil and/or groundwater may be made by authorized states based on whether constituents from "listed" waste(s) are below health-based levels. Screening levels specified in Appendix A – Table A-6 of the remediation closure guidance system developed by IDEM represent appropriate health-based levels for determining if soil or groundwater contains "listed" hazardous waste. This NPD explains how the screening levels in the Remediation Closure Guide will be used to make determinations on whether constituents from listed hazardous wastes are contained-in soil or groundwater.

This NPD is applicable to soil and/or groundwater which is generated and subsequently managed, and does not replace or alter requirements for closure or clean-up requirements found in various regulatory authorities.

This NPD is applicable for environmental media that will be managed:

- Off-site as a solid waste in a permitted disposal facility (e.g. municipal solid waste landfill),
- Groundwater that is solidified and managed off-site as a solid waste in a permitted disposal facility (e.g. municipal solid waste landfill), and
- Groundwater that is managed in a unit subject to Clean Water Act

Consistent with US EPA policy, a written "contained-in" determination must be obtained from IDEM.

4.0 DEFINITIONS

- 4.1. "Agency" – The Indiana Department of Environmental Management (IDEM).
- 4.2. "Characteristic Hazardous Waste" – A solid waste as defined in 40 CFR 261.2 which is not excluded from regulation under 40 CFR 261.4(b), is a hazardous waste if it exhibits any of the following characteristics as defined by 40 CFR 261 Subpart C as adopted in 329 IAC 3.1:
 - A. Ignitability
 - B. Corrosivity
 - C. Reactivity
 - D. Toxicity
- 4.3. "Contained-in Determination" – Written determination granted by US EPA or an authorized state that certifies an environmental media (soil or groundwater) is no longer considered a hazardous waste.
- 4.4. "Contaminant of concern" (COC) – Chemicals that are included in the hazardous waste "Industry and US EPA hazardous waste number" sections listed in 40 CFR Subpart D. The contaminants of concern will consist and correlate to the listed hazardous waste identified as impacting the environmental media in the 'contained-in' determination request.
- 4.5. "Environmental media" – is naturally occurring soil and groundwater.
- 4.6. "Hazardous waste" – Hazardous waste as defined in 40 CFR 261 subpart B.
- 4.7. "Listed hazardous waste" - A solid waste as defined in 40 CFR 261.2, which is not excluded from regulation under 40 CFR 261.4(b), which is included in the lists in 40 CFR 261 Subpart D, and which has not been excluded under 40 CFR 260.20 and 40 CFR 260.22 as adopted in 329 IAC 3.1.
- 4.8. "Nonrule policy document" - The term assigned by the Indiana Department of Environmental Management (IDEM) to those policies identified in IC 13-14-1-11.5 as any policy that: A. Interprets, supplements, or implements a statute or rule; B. Has not been adopted in compliance with IC 4-22-2; C. Is not intended by IDEM to have the effect of law; and D. Does not apply solely to the internal IDEM organization (is not an Administrative Policy).
- 4.9. "Remediation Closure Guide" – An IDEM NPD describing selected approaches to investigation and risk-based closure of contaminated or potentially contaminated sites. Its purpose is to provide for consistent application of Indiana Code (IC) 13-12-3-2 and IC 13-25-5-8.5, which form the statutory basis for risk-based cleanup in Indiana.
- 4.10. "Resource Conservation and Recovery Act (RCRA)" – Refers to the federal Resource Conservation and Recovery Act as codified in 40 CFR and means the version of 40 CFR adopted by 329 Indiana Administrative Code 3.1.
- 4.11. "Screening levels" - Levels of hazardous substances and petroleum calculated by the department using standard equations and default values for particular hazardous substances or petroleum. (IDEM Remediation Closure Guide Appendix A)

4.12. "Soil" – Unconsolidated earth material composing the superficial geologic strata (material overlying bedrock), consisting of clay, silt, sand or gravel as classified by the U.S. Natural Resources Conservation Service.

4.13. "Solid waste" – Solid Waste as defined in 40 CFR 261.2

5.0 ROLES

5.1 The Site Owner/Consultant/Operator or whomever requests a "contained-in" determination shall:

- Be responsible for conducting a waste determination/characterization of the environmental media-specific to the "contained-in" determination.
- Delineate areas to be removed as part of remediation removal and provide the volumes of material to be managed under this policy. Amounts of environmental media generated as investigation-derived wastes (IDW) should be included in the "contained-in" request.
- Sample and analyze the environmental media to determine if it has been impacted with listed hazardous wastes and/or if the environmental media exhibits hazardous waste characteristics. This will require collecting and analyzing representative samples of the environmental media in accordance with SW846 or other accepted methods and standards.
- Identify the hazardous waste listing codes to be considered for the 'contained-in' determination.
- Identify any hazardous waste characteristics exhibited in the environmental media considered for the 'contained-in' determination.
- Determine the concentration of the contaminants of concern in the environmental media and how those levels compare to the Screening Levels contained in the RCG.
- Submit a request for the environmental media to be exempted from being a hazardous waste through the "contained-in" determination process. At a minimum, the request should include the following:
 - A cover letter indicating the proposed "contained-in" request.
 - A completed 'Contained-in Checklist' (Included in Appendix 1).
 - Laboratory analytical results. Analytical data submitted to IDEM in support of a "contained-in" determination should include the items listed for Full QA/QC in Section 3.9, Table 3-A of the Remediation Closure Guide.
 - Map(s) indicating sample locations and points of generation
- Maintain records/documentation used as a basis for determining the concentration of the contaminants of concern in the environmental media.
- Provide IDEM with the intended location of disposal of the environmental media identified in the 'contained-in' determination.
- Maintain records of where the 'contained-in' environmental media was sent off-site.
- Contact IDEM if the facility wishes to pursue a case-by-case exemption and for information on the development of a site-specific risk analysis to establish exit levels.

5.2 IDEM Technical Environmental Specialist E7 shall:

- Review contained-in determination request.
- Determine if data provided supports the approval of a contained-in request.

- Generate a letter responding to the "contained-in" request. That letter could be any one of the following:
 - Request for additional information.
 - Approval of the contained-in determination request.
 - Denial of the contained-in determination request.
- Route the letter to the branch chief for approval and signature.

5.3 IDEM branch chief shall:

- Receive and route "contained-in" requests to the E7.
- Review the letters and sign as appropriate.
- Route the signed letters to the Branch administrative assistant for mailing and entry into the IDEM Virtual File Cabinet (VFC) electronic file system.

6.0 POLICY

6.1 Use of Commercial/Industrial Screening Levels

The "Direct" Commercial/Industrial screening levels in Table A-6 may be used as the basis for a "contained-in" determination when:

- The environmental media is not characteristically hazardous,
- All applicable LDR requirements are met, and
- The soil will be disposed at a permitted disposal facility (e.g. municipal solid waste landfill).

Groundwater, solidified for disposal, which then meets the "Direct" Commercial/Industrial screening levels in Table A-6 for soil may be disposed at a permitted facility (e.g. municipal solid waste landfill).

The Remediation Closure Guide does not contain Commercial/Industrial screening levels for groundwater. It has been determined that the Residential Groundwater Closure Level increased by a factor of ten (x10) may be used as the Commercial/Industrial groundwater "exit" level for groundwater that is managed in any unit subject to Federal Clean Water Act.

6.2 Determination Approval

In order to be approved for a "contained-in" determination, indicating that an environmental media no longer contains hazardous waste and is not subject to RCRA regulatory management requirements, the environmental media must meet the following requirements:

- (1) Be below contaminant of concern (COC) concentration levels in Table A-6, Commercial/Industrial Levels of the RCG,
- (2) Not exhibit a hazardous characteristic,
- (3) Meet US EPA Land Disposal Restriction (LDR) requirements, if applicable, including alternative standards established for contaminated soils (40 CFR 268.49), and
- (4) Be disposed of in a permitted disposal facility (e.g. municipal solid waste

landfill).

Due to the complexity of establishing the appropriate 'exit level' from RCRA regulations, and the need to be consistent with US EPA policy, any facility that intends to demonstrate that environmental media no longer contains a listed hazardous waste must obtain a written "contained-in" determination approval from IDEM.

If the environmental media is deemed to meet the aforementioned criteria, the agency will notify the requesting entity of a "contained-in" determination approval. The approvals are based on either set amounts of environmental media to be disposed during a short duration one-time approval or for repeatedly generated investigation derived wastes that will be generated over a period of time. Any on-going approval would be based on the future generated environmental media meeting the required contained-in criteria specified above.

All approvals for a one-time generation of a "contained-in" waste will expire one calendar year after issuance.

All approvals for reoccurring investigative derived "contained-in" wastes will expire two calendar years after the date of issuance and will require a resubmittal for consideration of continued approval at the completion of the two-year period.

Screening levels at the time of the renewal/resubmittal will be used when evaluating the "contained-in" determination for renewal.

6.3 Other Options

On a case by case basis, facilities may develop site-specific risk analysis to establish non-default exit levels. If a case-by-case site-specific risk analysis is requested by the owner/operator, a written request will need to be submitted to the agency and a written approval will be required.

Please contact the staff of the Hazardous and Industrial Waste Compliance Program, Office of Land Quality, at 317-234-6923 for additional information on case-by-case approvals.

7.0 REFERENCES

7.1. Indiana Administrative Codes:

- A. 329 IAC 3.1, Hazardous Waste Management Permit Program and Related Hazardous Waste Management
- B. 329 IAC 10, Solid Waste Disposal Facilities

7.2. Indiana Statutes:

- A. IC 13

7.3. Agency Policies:

- A. Remediation Closure Guide NPD (Waste-0046-R1)
- B. Contained-In Determination NPD (Waste-0052)

7.4 U.S. EPA Contained-in Policy:

This document is 56 pages long and rather than it being included in this document, it is referenced by website address.

http://www.epa.gov/osw/hazard/correctiveaction/resources/guidance/remwaste/refmc_es/12cntdin.pdf

8.0 SIGNATURES

Thomas W. Easterly, Commissioner
Indiana Department of Environmental Management

12/24/2014

Date

Bruce Palin, Assistant Commissioner
Office of Land Quality

3/14/14

Date

Carol Comer, Assistant Commissioner
Office of Legal Counsel and Criminal Investigations

4/18/2014

Date

Quality Improvement Program
Office of Planning and Assessment
Indiana Department of Environmental Management

12-29-2014

Date

Appendix 1

Information Checklist for Contained-In Request

1. Name of responsible party (property owner/operator).
2. Site description (Name, Address, Size of Site, and Number of Areas Involved). Please provide any site ID# such as EPA ID#, VRP number, etc.
3. Is the site subject to RCRA corrective action, enforcement orders?
4. Is the site being remediated under state or federal oversight? Identify Agency and Agency contacts.
5. How was the site contaminated? (Spill of hazardous waste, product release, process waste release, other?)
6. When was the site contaminated?
7. What EPA waste codes apply and why? Indicate all listed and characteristics codes applicable to the material which contaminated the site.
8. Does the environmental media exhibit any characteristics of hazardous waste, in addition to being contaminated with a listed waste? If it does, the environmental media would be subject to hazardous waste rules regardless of listed waste concentration. Environmental media cannot exit the hazardous waste system unless treated to remove the hazardous waste characteristic(s).
9. Which specific hazardous substances/constituents are present based on analytical results? Be sure to include all the breakdown products of the listed waste.
10. What is the volume/quantity of environmental media involved? An estimate of the volume/quantity will provide some idea of what size project is being addressed.
11. Will the environmental media in question be generated one time only, as a batch or in a continuous manner?
12. Is treatment of the environmental media involved or necessary?
13. Analytical sample results from the laboratory conducting the analysis and the test methods used to analyze the environmental media. Results must be based upon representative sampling.
14. A description of the sampling plan and methods used to assure representative sampling.
15. QA/QC documentation should be provided. Analytical data submitted to IDEM in support of a "contained-in" determination should include the items listed for Full QA/QC in Section 3.9, Table 3-A of the Remediation Closure Guide.
16. How will the environmental media be managed at the generation site, intermediate sites, and final destination? What time periods are involved?
17. What is the final destination of the environmental media and how is it to be managed at the final destination site?
18. How will the company assure contained-in threshold levels are attained for environmental media that will be generated on an ongoing basis?

EMANUEL, DONNA

From: Brad Gentry <bgentry@iwmconsult.com>
Sent: Friday, May 03, 2019 1:54 PM
To: NADDY, JOHN
Cc: Christopher Schoo; Chris Parks
Subject: EPA ID#IND 044 587 848 - 980 Hurricane Road, Franklin IN - Contained-In Determination Request - Remediation Derived Waste
Attachments: Request for Contained-In Determination Letter_RDW_Formal Amphenol Facility_May 3 2019.pdf

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

John

Good afternoon. Per our discussion, please find attached the Contained In Determination Request for the remediation derived waste associated with the above referenced facility.

Please contact me with questions or if you need anything else. As you know, we would like to get the waste offsite as soon as possible. Thanks for your help processing this request.

Sincerely,

Bradley E. Gentry, LPG
Vice President/Brownfield Coordinator
IWM Consulting Group, LLC
7428 Rockville Road
Indianapolis, IN 46214
Mobile: (317) 435-8877
Office: (317) 968-9256
Fax: (317) 347-9326



7428 Rockville Road | Indianapolis, IN 46214 | 317.347.1111 office | 317.347.9326 fax

May 3, 2019

Mr. John P. Naddy
 Technical Environmental Specialist
 Indiana Department of Environmental Management
 Office of Land Quality, Compliance and Emergency Response Branch
 100 North Senate Avenue
 Room IGCN 1101
 Indianapolis, Indiana 46204

Re: Request for Contained-In Policy Determination Letter – Remediation Derived Waste
Former Franklin Power Products, Inc./Amphenol Corporation Facility
 980 Hurricane Road
 Franklin, Indiana 46131
 EPA ID #IND 044 587 848

Dear Mr. Naddy:

Industrial Waste Management Consulting Group, LLC (IWM Consulting) is submitting this *Request for Contained-In Policy Determination Letter* to the Indiana Department of Environmental Management (IDEM) on behalf of Amphenol Corporation (Amphenol) for the former Franklin Power Products, Inc./Amphenol Corporation Facility (Site) located at 980 Hurricane Road, Franklin, IN. At this time, Amphenol is formally requesting a Contained-In Policy determination on remediation derived waste (RDW) generated during the emergency repair of an off-site sanitary sewer line servicing a residential neighborhood potentially impacted by historic operations conducted at the site.

A copy of the applicable analytical report is included in **Attachment A**. Analytical results are summarized and presented in the **Tables Section** of this letter report. The items requested in the information checklist for Contained-In Determinations are as follows:

1. *Name of Responsible Party (property owner/operator).*

Performing Respondent:
 Amphenol Corporation
 40-60 Delaware Avenue
 Sydney, New York 13838
 Mr. Joe Bianchi-Group EHS Manager

2. *Site Description (Name, Address, Size of Site, and Number of Areas involved.). Please provide any site ID# such as EPA ID#, VRP number, etc.*

Former Franklin Power Products, Inc. /Amphenol Corporation Facility
 980 Hurricane Road
 Franklin, Indiana
 EPA ID #IND 044 587 848

The historical Site originally consisted of approximately 10.82 acres situated in a mixed commercial/residential area on the northeast side of Franklin, Indiana. It has since been split into three (3)

Request for Contained-In Policy Determination Letter
Former Franklin Power Products Inc./Amphenol Corp. Facility
 Franklin, Indiana
 Page 2 of 5

parcels (parcel no. 41-08-13-022-011.000-009, parcel no. 41-08-13-022-005.000-009, and parcel no. 41-08-13-022-011.001-009) under separate ownership. One of the parcels is currently listed as industrial vacant land. One parcel is occupied and is zoned as industrial small shops and the last parcel is also occupied, listed as light industrial manufacturing, and primarily consists of a 43,300-square foot structure.

3. Is the site subject to RCRA corrective action, enforcement orders?

The Site is subject to an Administrative Order on Consent under Resource Conservation and Recovery Act (RCRA) Section 3008 (h), USEPA Docket #R8H-5-99-002. The USEPA signed the RCRA Interim Final Decision in August 1997 and the Administrative Order on Consent for Corrective Measures Implementation in 1998. The approved Interim Corrective Measure (ICM) consists of a groundwater pump and treat system, which initiated operations in February 1995.

4. Is the site being remediated under state or federal oversight? Identify Agency and Agency contacts.

Yes. The ongoing assessment, monitoring and remedial activities for the Site are under the oversight of USEPA Region V. The USEPA project manager is Ms. Carolyn Bury (phone number 312-886-3020).

5. How was the site contaminated? Spill of hazardous waste, product release, process waste release, other?

Historical operations at the Site included electroplating, machining, assembling, and storage of components as well as the inventorying of various hazardous raw materials and components for production. It is assumed that the Site became contaminated from inadvertent spills or releases of those materials and via leakage of permitted wastewater discharges (between 1961 and 1983) through cracks/breaks in the Site's sanitary sewer line.

6. When was the site contaminated?

The operational Site history and investigation results suggests that contamination occurred between 1961 and 1983.

7. What EPA Waste Codes apply and why? Indicate all listed and characteristic codes applicable to the material which contaminated the site?

Based upon the "findings of fact" stipulated in the agreed consent order, a previous owner of the Site, Bendix Corporation, operated the facility as a hazardous waste management facility on and after November 19, 1980. In its Part A application, Bendix Corporation identified itself as handling the following hazardous wastes at the facility: F001, F005, F006, and F007. Additionally, areas at the facility were known to have contained or stored 1,1,1-trichloroethane (U226), tetrachloroethylene (U210) and trichloroethylene (U228) in above ground storage tanks or drums.

A RCRA Site Detail report obtained from Mr. Matthew Peterschmidt of IDEM in December of 2018 also lists the following additional waste codes associated with the facility as reported on one or more of the historical site identification forms: D001, D002, F008 and F009.

A considerable amount of soil and groundwater sampling has occurred at the Site during the RCRA Closure and associated RCRA Facility Investigation and ICM activities since the release was first discovered in February 1984. USEPA oversight personnel after reviewing 30 plus years of assessment activities, have identified the following Site-related constituents as the target analyte list: vinyl chloride,



Request for Contained-In Policy Determination Letter
Former Franklin Power Products Inc./Amphenol Corp. Facility
 Franklin, Indiana
 Page 3 of 5

trans-1,2-dichloroethylene, 1,1-dichloroethane, cis-1,2-dichloroethylene, 1,2-dichloroethane, methylene chloride, 1,1,1-trichloroethane, trichloroethylene, and tetrachloroethylene. As such, future analysis conducted on soil and groundwater samples during assessment activities will only include these “short list” volatile organic compounds (VOCs). However, “full list” VOC sampling was conducted on the RDW in question.

8. *Does the media exhibit any characteristics of hazardous waste, in addition to being contaminated with a listed waste? If it does, the media would be subject to hazardous waste rule regardless of listed waste concentration. Media cannot exit hazardous waste system unless treated to remove the characteristics.*

No, the media under consideration for this submittal (soil) does not exhibit the defined characteristics of hazardous waste such as ignitability, corrosivity, reactivity or toxicity.

9. *Which specific hazardous substances/constituents are present based on analytical results? Be sure to include breakdown products of the listed waste.*

Based upon the current analytical results of the RDW currently stored on-site, the following constituents were detected in the samples collected from the roll-off boxes.

Soil

Trichloroethylene (TCE), tetrachloroethylene (PCE), 1,2,4-trimethylbenzene, xylenes, cadmium, chromium, and nickel.

None of above listed constituents were detected at concentrations exceeding applicable exit levels, i.e. 2019 IDEM Remediation Closure Guide (RCG) Industrial/Commercial Soil Direct Contact Screening Levels (IDSCL).

10. *What is the volume/quantity of environmental media involved?*

Currently, five (5) 20-yard roll-off boxes containing approximately 15 yards of impacted soils are staged on-site.

11. *Will the media in question be generated one time only, as a batch or in a continuous manner?*

This determination request is only addressing RDW generated during the April 29, 2019 emergency sewer line repair. A subsequent request will be made to address a proposed sewer line replacement with over-excavation for remediation purposes in the summer of 2019.

12. *Is treatment of the media involved or necessary?*

No treatment of the media post containerization will take place.

13. *Analytical results and test methods. Results must be based upon representative sampling.*

Analytical results are based upon representative composite samples of each individual roll-off box. The samples were analyzed for full list VOCs utilizing SW-846 Method 8260 as well as the additional parameters requested in the IDEM February 27, 2019 response letter to a previous investigation derived waste contained-in determination request. These additional requested parameters included cadmium,



Request for Contained-In Policy Determination Letter
Former Franklin Power Products Inc./Amphenol Corp. Facility
Franklin, Indiana
Page 4 of 5

chromium, and nickel which were analyzed using SW-846 Method 6020 as well as cyanide which was analyzed using SW-846 Method 9012.

A copy of the applicable analytical report is included in **Attachment A**. Results are also summarized and presented in the **Tables Section** of this letter report.

14. A description of the sampling plan and methods used to assure representative sampling.

One (1) composite sample was obtained from each of the five (5) roll-off boxes. Consequently, a total of five (5) composite samples were obtained and each sample was labeled with the corresponding roll-off box identification number. The samples were collected in accordance with USEPA Sampling Method 5035 using bulk TerraCore Sampling supplies, including the 5-gram T-handle sampling device (or comparable).

The sample containers were immediately labeled and placed on ice. The samples were then submitted under chain-of-custody controls to Pace Analytical Services, LLC (Pace) for analysis of VOCs, cadmium, chromium, nickel and cyanide. The samples were analyzed using Level II quality assurance/quality control (QA/QC).

15. QA/QC documentation should be provided.

IWM Consulting is submitting the full analytical reports in electronic format in **Attachment A** which include the items listed for Full QA/QC and/or the Minimum Data Documentation Requirements in Section 3.9, Table 3-A of the Remediation Closure Guide. During the sampling conducted on April 29, 2019, QA/QC procedures were followed and are available if requested.

16. How will the material be managed at the generation site, intermediate sites, and final destination? What time periods are involved?

The RDW is currently secured on-site in lined and tarped roll-off boxes pending a contained-in determination by IDEM. Once approved the roll-off boxes will be picked up and transported to an approved Subtitle D landfill facility. All of the RDW will be properly manifested during the transportation, storage, and disposal process.

17. What is the final destination of the contaminated media, and how is it to be managed at the final destination site?

The non-hazardous material will be disposed of at the CGS Services Inc. landfill located in Morristown, IN.

18. How will the company assure contained-in threshold levels are attained for media that will be generated on an ongoing basis?

This request does not address RDW generated on an on-going basis.



Request for Contained-In Policy Determination Letter
Former Franklin Power Products Inc./Amphenol Corp. Facility
Franklin, Indiana
Page 5 of 5

At this time, IWM Consulting, on behalf of Amphenol Corporation, is formally requesting approval of a Contained-In Policy Determination for the existing RDW. IWM Consulting trusts that the information provided satisfies the IDEM Contained-In Determination requirements and will schedule the removal and disposal activities as quickly as possible once the Contained-in approval letter has been received.

If you have any questions regarding this submittal, contact either of the undersigned at (317) 347-1111.

Sincerely,

IWM CONSULTING GROUP, LLC



Christopher D. Schoo,
Senior Staff Scientist



Bradley E. Gentry, LPG #2165
Vice President/Brownfield Coordinator

cc: Attachments



TABLES

WASTE CHARACTERIZATION ANALYTICAL RESULTS

Table 1
Roll Off Box Waste Characterization Sample Analytical Results
Former Amphenol Facility
980 Hurricane Road
Franklin, Indiana

Sample ID	SB1696	SB1126	SB1516	SB-FD1 (SB1516)	SB1044	SB1050	2019 RCG IDCSLs
Sample Location	Rolloff Box 1696	Rolloff Box 1126	Rolloff Box 1516	Duplicate of SB1516 (Rolloff box 1516)	Rolloff box 1044	Rolloff Box 1050	NA
VOCs							
Tetrachloroethylene	0.0066	0.008	0.0083	0.0083	<0.0045	<0.0043	170
Trichloroethene	0.017	0.016	0.0093	0.0095	0.0069	0.0097	19
1,2,4-Trimethylbenzene	0.0064	<0.0043	<0.044	<0.0040	<0.0045	<0.0043	220
Xylene (Total)	0.012	<0.0086	<0.0087	<0.0080	<0.0089	<0.0086	260
Other							
Total Cadmium	0.23	0.14	0.21	0.12	0.13	0.17	980
Total Chromium	12.8	15.5	13.3	11.6	11.4	15.1	63*
Total Nickel	14.8	16.3	19.5	14.3	13.3	17.3	22,000
Total Cyanide	<0.28	<0.28	<0.30	<0.29	<0.28	<0.29	150

Notes:

Samples collected by IWM Consulting personnel and analyzed at Pace Analytical Services located in Indianapolis, IN.

Unlisted compounds below laboratory reporting limits for all samples.

All results in mg/kg.

VOCs analyzed using SW846 Method 8260, metals analyzed using Method 6020, cyanide analyzed using Method 9012.

2019 RCG IDCSLs-Commercial/Industrial Soil Direct Contact Screening Levels (IDCLs) corresponding to the levels published in

Appendix A, Table A-6 of the RCG, updated March 4, 2019.

* Denotes lowest applicable standard for hexavalent chrome

ATTACHMENT A
ANALYTICAL REPORT





Pace Analytical Services, LLC
7726 Moller Road
Indianapolis, IN 46268
(317)228-3100

May 03, 2019

Mr. Chris Newell
IWM Consulting
7428 Rockville Road
Indianapolis, IN 46214

RE: Project: Amphenol / Franklin Power Prod
Pace Project No.: 50223418

Dear Mr. Newell:

Enclosed are the analytical results for sample(s) received by the laboratory on April 30, 2019. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that appears to read "Chris Boyle".

Chris Boyle
chris.boyle@pacelabs.com
(317)228-3100
Project Manager

Enclosures

cc: Mr. Brad Gentry, IWM Consulting
Mr. Brad Gentry, IWM Consulting Group, LLC



REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

CERTIFICATIONS

Project: Amphenol / Franklin Power Prod
 Pace Project No.: 50223418

Ormond Beach Certification IDs

8 East Tower Circle, Ormond Beach, FL 32174	Missouri Certification #: 236
Alaska DEC- CS/UST/LUST	Montana Certification #: Cert 0074
Alabama Certification #: 41320	Nebraska Certification: NE-OS-28-14
Arizona Certification# AZ0819	New Hampshire Certification #: 2958
Colorado Certification: FL NELAC Reciprocity	New Jersey Certification #: FL022
Connecticut Certification #: PH-0216	New York Certification #: 11608
Delaware Certification: FL NELAC Reciprocity	North Carolina Environmental Certificate #: 667
Florida Certification #: E83079	North Carolina Certification #: 12710
Georgia Certification #: 955	North Dakota Certification #: R-216
Guam Certification: FL NELAC Reciprocity	Oklahoma Certification #: D9947
Hawaii Certification: FL NELAC Reciprocity	Pennsylvania Certification #: 68-00547
Illinois Certification #: 200068	Puerto Rico Certification #: FL01264
Indiana Certification: FL NELAC Reciprocity	South Carolina Certification: #96042001
Kansas Certification #: E-10383	Tennessee Certification #: TN02974
Kentucky Certification #: 90050	Texas Certification: FL NELAC Reciprocity
Louisiana Certification #: FL NELAC Reciprocity	US Virgin Islands Certification: FL NELAC Reciprocity
Louisiana Environmental Certificate #: 05007	Virginia Environmental Certification #: 460165
Maryland Certification: #346	West Virginia Certification #: 9962C
Michigan Certification #: 9911	Wisconsin Certification #: 399079670
Mississippi Certification: FL NELAC Reciprocity	Wyoming (EPA Region 8): FL NELAC Reciprocity

Indiana Certification IDs

7726 Moller Road, Indianapolis, IN 46268	Ohio VAP Certification #: CL0065
Illinois Certification #: 200074	Oklahoma Certification #: 2018-101
Indiana Certification #: C-49-06	Texas Certification #: T104704355
Kansas/NELAP Certification #: E-10177	West Virginia Certification #: 330
Kentucky UST Certification #: 80226	Wisconsin Certification #: 999788130
Kentucky VVV Certification #: 98019	USDA Soil Permit #: P330-16-00257
Michigan Department of Environmental Quality, Laboratory #9050	

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

SAMPLE SUMMARY

Project: Amphenol / Franklin Power Prod
 Pace Project No.: 50223418

Lab ID	Sample ID	Matrix	Date Collected	Date Received
50223418001	SB1696	Solid	04/29/19 09:20	04/30/19 08:25
50223418002	SB1126	Solid	04/29/19 09:40	04/30/19 08:25
50223418003	SB1516	Solid	04/29/19 10:00	04/30/19 08:25
50223418004	SB1044	Solid	04/29/19 14:15	04/30/19 08:25
50223418005	SB1050	Solid	04/29/19 15:50	04/30/19 08:25
50223418006	SB-FD1	Solid	04/29/19 08:00	04/30/19 08:25
50223418007	SB-TB1	Solid	04/29/19 08:00	04/30/19 08:25

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

SAMPLE ANALYTE COUNT

Project: Amphenol / Franklin Power Prod
 Pace Project No.: 50223418

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
50223418001	SB1696	EPA 6020	DMT	3	PASI-I
		EPA 8260	ALA	72	PASI-I
		SM 2540G	NMW	1	PASI-I
		EPA 9012	MH1	1	PASI-O
50223418002	SB1126	EPA 6020	DMT	3	PASI-I
		EPA 8260	ALA	72	PASI-I
		SM 2540G	NMW	1	PASI-I
		EPA 9012	MH1	1	PASI-O
50223418003	SB1516	EPA 6020	DMT	3	PASI-I
		EPA 8260	ALA	72	PASI-I
		SM 2540G	NMW	1	PASI-I
		EPA 9012	MH1	1	PASI-O
50223418004	SB1044	EPA 6020	DMT	3	PASI-I
		EPA 8260	ALA	72	PASI-I
		SM 2540G	NMW	1	PASI-I
		EPA 9012	MH1	1	PASI-O
50223418005	SB1050	EPA 6020	DMT	3	PASI-I
		EPA 8260	ALA	72	PASI-I
		SM 2540G	NMW	1	PASI-I
		EPA 9012	MH1	1	PASI-O
50223418006	SB-FD1	EPA 6020	DMT	3	PASI-I
		EPA 8260	ALA	72	PASI-I
		SM 2540G	NMW	1	PASI-I
		EPA 9012	MH1	1	PASI-O
50223418007	SB-TB1	EPA 8260	ALA	72	PASI-I

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

SUMMARY OF DETECTION

Project: Amphenol / Franklin Power Prod
 Pace Project No.: 50223418

Lab Sample ID	Client Sample ID					
Method	Parameters	Result	Units	Report Limit	Analyzed	Qualifiers
50223418001	SB1696					
EPA 6020	Cadmium	0.23	mg/kg	0.055	05/01/19 08:54	
EPA 6020	Chromium	12.8	mg/kg	1.1	05/01/19 07:36	
EPA 6020	Nickel	14.8	mg/kg	0.27	05/01/19 07:36	
EPA 8260	Tetrachloroethene	0.0066	mg/kg	0.0042	04/30/19 16:21	
EPA 8260	Trichloroethene	0.017	mg/kg	0.0042	04/30/19 16:21	
EPA 8260	1,2,4-Trimethylbenzene	0.0064	mg/kg	0.0042	04/30/19 16:21	
EPA 8260	Xylene (Total)	0.012	mg/kg	0.0083	04/30/19 16:21	
SM 2540G	Percent Moisture	10.5	%	0.10	04/30/19 14:26	
50223418002	SB1126					
EPA 6020	Cadmium	0.14	mg/kg	0.055	05/01/19 08:58	
EPA 6020	Chromium	15.5	mg/kg	1.1	05/01/19 07:41	
EPA 6020	Nickel	16.3	mg/kg	0.28	05/01/19 07:41	
EPA 8260	Tetrachloroethene	0.0080	mg/kg	0.0043	04/30/19 16:59	
EPA 8260	Trichloroethene	0.016	mg/kg	0.0043	04/30/19 16:59	
SM 2540G	Percent Moisture	10.6	%	0.10	04/30/19 14:26	
50223418003	SB1516					
EPA 6020	Cadmium	0.21	mg/kg	0.059	05/01/19 09:48	
EPA 6020	Chromium	13.3	mg/kg	1.2	05/01/19 08:22	
EPA 6020	Nickel	19.5	mg/kg	0.29	05/01/19 08:22	
EPA 8260	Tetrachloroethene	0.0083	mg/kg	0.0044	04/30/19 18:54	
EPA 8260	Trichloroethene	0.0093	mg/kg	0.0044	04/30/19 18:54	
SM 2540G	Percent Moisture	17.0	%	0.10	04/30/19 14:26	
50223418004	SB1044					
EPA 6020	Cadmium	0.13	mg/kg	0.055	05/01/19 09:52	
EPA 6020	Chromium	11.4	mg/kg	1.1	05/01/19 08:26	
EPA 6020	Nickel	13.3	mg/kg	0.28	05/01/19 08:26	
EPA 8260	Trichloroethene	0.0069	mg/kg	0.0045	04/30/19 19:32	
SM 2540G	Percent Moisture	12.0	%	0.10	04/30/19 14:26	
50223418005	SB1050					
EPA 6020	Cadmium	0.17	mg/kg	0.054	05/01/19 10:02	
EPA 6020	Chromium	15.1	mg/kg	1.1	05/01/19 08:31	
EPA 6020	Nickel	17.3	mg/kg	0.27	05/01/19 08:31	
EPA 8260	Trichloroethene	0.0097	mg/kg	0.0043	04/30/19 20:10	
SM 2540G	Percent Moisture	13.0	%	0.10	04/30/19 14:26	
50223418006	SB-FD1					
EPA 6020	Cadmium	0.12	mg/kg	0.055	05/01/19 10:15	
EPA 6020	Chromium	11.6	mg/kg	1.1	05/01/19 08:35	
EPA 6020	Nickel	14.3	mg/kg	0.27	05/01/19 08:35	
EPA 8260	Tetrachloroethene	0.0083	mg/kg	0.0040	04/30/19 20:49	
EPA 8260	Trichloroethene	0.0095	mg/kg	0.0040	04/30/19 20:49	
SM 2540G	Percent Moisture	13.7	%	0.10	04/30/19 14:26	

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB1696 Lab ID: 50223418001 Collected: 04/29/19 09:20 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report					CAS No.	Qual	
			Limit	MDL	DF	Prepared	Analyzed			
6020 MET ICPMS Analytical Method: EPA 6020 Preparation Method: EPA 3050B										
Cadmium	0.23	mg/kg	0.055	0.046	1	04/30/19 22:34	05/01/19 08:54	7440-43-9		
Chromium	12.8	mg/kg	1.1	0.57	5	04/30/19 22:34	05/01/19 07:36	7440-47-3		
Nickel	14.8	mg/kg	0.27	0.17	5	04/30/19 22:34	05/01/19 07:36	7440-02-0		
8260 MSV 5035A VOA Analytical Method: EPA 8260										
Acetone	ND	mg/kg	0.083	0.012	1		04/30/19 16:21	67-64-1		
Acrolein	ND	mg/kg	0.083	0.0069	1		04/30/19 16:21	107-02-8		
Acrylonitrile	ND	mg/kg	0.083	0.0019	1		04/30/19 16:21	107-13-1		
Benzene	ND	mg/kg	0.0042	0.00016	1		04/30/19 16:21	71-43-2		
Bromobenzene	ND	mg/kg	0.0042	0.00031	1		04/30/19 16:21	108-86-1		
Bromochloromethane	ND	mg/kg	0.0042	0.00037	1		04/30/19 16:21	74-97-5		
Bromodichloromethane	ND	mg/kg	0.0042	0.00032	1		04/30/19 16:21	75-27-4		
Bromoform	ND	mg/kg	0.0042	0.00054	1		04/30/19 16:21	75-25-2		
Bromomethane	ND	mg/kg	0.0042	0.00072	1		04/30/19 16:21	74-83-9		
2-Butanone (MEK)	ND	mg/kg	0.021	0.0027	1		04/30/19 16:21	78-93-3		
n-Butylbenzene	ND	mg/kg	0.0042	0.00027	1		04/30/19 16:21	104-51-8		
sec-Butylbenzene	ND	mg/kg	0.0042	0.00025	1		04/30/19 16:21	135-98-8		
tert-Butylbenzene	ND	mg/kg	0.0042	0.00034	1		04/30/19 16:21	98-06-6		
Carbon disulfide	ND	mg/kg	0.0083	0.00023	1		04/30/19 16:21	75-15-0		
Carbon tetrachloride	ND	mg/kg	0.0042	0.00028	1		04/30/19 16:21	56-23-5		
Chlorobenzene	ND	mg/kg	0.0042	0.00023	1		04/30/19 16:21	108-90-7		
Chloroethane	ND	mg/kg	0.0042	0.00040	1		04/30/19 16:21	75-00-3		
Chloroform	ND	mg/kg	0.0042	0.00024	1		04/30/19 16:21	67-66-3		
Chloromethane	ND	mg/kg	0.0042	0.0015	1		04/30/19 16:21	74-87-3		
2-Chlorotoluene	ND	mg/kg	0.0042	0.00027	1		04/30/19 16:21	95-49-8		
4-Chlorotoluene	ND	mg/kg	0.0042	0.00017	1		04/30/19 16:21	106-43-4		
Dibromochloromethane	ND	mg/kg	0.0042	0.00042	1		04/30/19 16:21	124-48-1		
1,2-Dibromoethane (EDB)	ND	mg/kg	0.0042	0.00032	1		04/30/19 16:21	106-93-4		
Dibromomethane	ND	mg/kg	0.0042	0.00036	1		04/30/19 16:21	74-95-3		
1,2-Dichlorobenzene	ND	mg/kg	0.0042	0.00033	1		04/30/19 16:21	95-50-1		
1,3-Dichlorobenzene	ND	mg/kg	0.0042	0.00024	1		04/30/19 16:21	541-73-1		
1,4-Dichlorobenzene	ND	mg/kg	0.0042	0.00029	1		04/30/19 16:21	106-46-7		
trans-1,4-Dichloro-2-butene	ND	mg/kg	0.083	0.00047	1		04/30/19 16:21	110-57-6		
Dichlorodifluoromethane	ND	mg/kg	0.0042	0.00017	1		04/30/19 16:21	75-71-8		
1,1-Dichloroethane	ND	mg/kg	0.0042	0.00023	1		04/30/19 16:21	75-34-3		
1,2-Dichloroethane	ND	mg/kg	0.0042	0.00032	1		04/30/19 16:21	107-06-2		
1,1-Dichloroethene	ND	mg/kg	0.0042	0.00033	1		04/30/19 16:21	75-35-4		
cis-1,2-Dichloroethene	ND	mg/kg	0.0042	0.00030	1		04/30/19 16:21	156-59-2		
trans-1,2-Dichloroethene	ND	mg/kg	0.0042	0.00030	1		04/30/19 16:21	156-60-5		
1,2-Dichloropropane	ND	mg/kg	0.0042	0.00024	1		04/30/19 16:21	78-87-5		
1,3-Dichloropropane	ND	mg/kg	0.0042	0.00033	1		04/30/19 16:21	142-28-9		
2,2-Dichloropropane	ND	mg/kg	0.0042	0.00020	1		04/30/19 16:21	594-20-7		
1,1-Dichloropropene	ND	mg/kg	0.0042	0.00020	1		04/30/19 16:21	563-58-6		
cis-1,3-Dichloropropene	ND	mg/kg	0.0042	0.00027	1		04/30/19 16:21	10061-01-5		
trans-1,3-Dichloropropene	ND	mg/kg	0.0042	0.00026	1		04/30/19 16:21	10061-02-6		

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB1696 Lab ID: 50223418001 Collected: 04/29/19 09:20 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report				Prepared	Analyzed	CAS No.	Qual				
			Limit	MDL	DF									
8260 MSV 5035A VOA														
			Analytical Method: EPA 8260											
Ethylbenzene	ND	mg/kg	0.0042	0.00020	1		04/30/19 16:21	100-41-4						
Ethyl methacrylate	ND	mg/kg	0.083	0.00066	1		04/30/19 16:21	97-63-2						
Hexachloro-1,3-butadiene	ND	mg/kg	0.0042	0.00023	1		04/30/19 16:21	87-68-3						
2-Hexanone	ND	mg/kg	0.083	0.0032	1		04/30/19 16:21	591-78-6						
Iodomethane	ND	mg/kg	0.083	0.00032	1		04/30/19 16:21	74-88-4						
Isopropylbenzene (Cumene)	ND	mg/kg	0.0042	0.00027	1		04/30/19 16:21	98-82-8						
p-Isopropyltoluene	ND	mg/kg	0.0042	0.00028	1		04/30/19 16:21	99-87-6						
Methylene Chloride	ND	mg/kg	0.017	0.0012	1		04/30/19 16:21	75-09-2						
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	0.021	0.0029	1		04/30/19 16:21	108-10-1						
Methyl-tert-butyl ether	ND	mg/kg	0.0042	0.00042	1		04/30/19 16:21	1634-04-4						
Naphthalene	ND	mg/kg	0.0042	0.00068	1		04/30/19 16:21	91-20-3						
n-Propylbenzene	ND	mg/kg	0.0042	0.00023	1		04/30/19 16:21	103-65-1						
Styrene	ND	mg/kg	0.0042	0.00027	1		04/30/19 16:21	100-42-5						
1,1,1,2-Tetrachloroethane	ND	mg/kg	0.0042	0.00034	1		04/30/19 16:21	630-20-6						
1,1,2,2-Tetrachloroethane	ND	mg/kg	0.0042	0.00064	1		04/30/19 16:21	79-34-5						
Tetrachloroethene	0.0066	mg/kg	0.0042	0.00028	1		04/30/19 16:21	127-18-4						
Toluene	ND	mg/kg	0.0042	0.00042	1		04/30/19 16:21	108-88-3						
1,2,3-Trichlorobenzene	ND	mg/kg	0.0042	0.00028	1		04/30/19 16:21	87-61-6						
1,2,4-Trichlorobenzene	ND	mg/kg	0.0042	0.00047	1		04/30/19 16:21	120-82-1						
1,1,1-Trichloroethane	ND	mg/kg	0.0042	0.00024	1		04/30/19 16:21	71-55-6						
1,1,2-Trichloroethane	ND	mg/kg	0.0042	0.00046	1		04/30/19 16:21	79-00-5						
Trichloroethene	0.017	mg/kg	0.0042	0.00021	1		04/30/19 16:21	79-01-6						
Trichlorofluoromethane	ND	mg/kg	0.0042	0.00022	1		04/30/19 16:21	75-69-4						
1,2,3-Trichloropropane	ND	mg/kg	0.0042	0.00057	1		04/30/19 16:21	96-18-4						
1,2,4-Trimethylbenzene	0.0064	mg/kg	0.0042	0.00040	1		04/30/19 16:21	95-63-6						
1,3,5-Trimethylbenzene	ND	mg/kg	0.0042	0.00026	1		04/30/19 16:21	108-67-8						
Vinyl acetate	ND	mg/kg	0.083	0.0012	1		04/30/19 16:21	108-05-4						
Vinyl chloride	ND	mg/kg	0.0042	0.00026	1		04/30/19 16:21	75-01-4						
Xylene (Total)	0.012	mg/kg	0.0083	0.00032	1		04/30/19 16:21	1330-20-7						
Surrogates														
Dibromofluoromethane (S)	113	%.	77-131		1		04/30/19 16:21	1868-53-7						
Toluene-d8 (S)	94	%.	77-127		1		04/30/19 16:21	2037-26-5						
4-Bromofluorobenzene (S)	97	%.	65-119		1		04/30/19 16:21	460-00-4						
Percent Moisture														
Percent Moisture	10.5	%	0.10	0.10	1		04/30/19 14:26							
9012 Cyanide, Total														
			Analytical Method: EPA 9012 Preparation Method: EPA 9012											
Cyanide	ND	mg/kg	0.28	0.16	1	05/02/19 18:20	05/02/19 21:21	57-12-5						

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB1126 Lab ID: 50223418002 Collected: 04/29/19 09:40 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report					CAS No.	Qual	
			Limit	MDL	DF	Prepared	Analyzed			
6020 MET ICPMS									Analytical Method: EPA 6020 Preparation Method: EPA 3050B	
Cadmium	0.14	mg/kg	0.055	0.046	1	04/30/19 22:34	05/01/19 08:58	7440-43-9		
Chromium	15.5	mg/kg	1.1	0.58	5	04/30/19 22:34	05/01/19 07:41	7440-47-3		
Nickel	16.3	mg/kg	0.28	0.17	5	04/30/19 22:34	05/01/19 07:41	7440-02-0		
8260 MSV 5035A VOA									Analytical Method: EPA 8260	
Acetone	ND	mg/kg	0.086	0.013	1		04/30/19 16:59	67-64-1		
Acrolein	ND	mg/kg	0.086	0.0071	1		04/30/19 16:59	107-02-8		
Acrylonitrile	ND	mg/kg	0.086	0.0020	1		04/30/19 16:59	107-13-1		
Benzene	ND	mg/kg	0.0043	0.00016	1		04/30/19 16:59	71-43-2		
Bromobenzene	ND	mg/kg	0.0043	0.00032	1		04/30/19 16:59	108-86-1		
Bromochloromethane	ND	mg/kg	0.0043	0.00038	1		04/30/19 16:59	74-97-5		
Bromodichloromethane	ND	mg/kg	0.0043	0.00032	1		04/30/19 16:59	75-27-4		
Bromoform	ND	mg/kg	0.0043	0.00056	1		04/30/19 16:59	75-25-2		
Bromomethane	ND	mg/kg	0.0043	0.00074	1		04/30/19 16:59	74-83-9		
2-Butanone (MEK)	ND	mg/kg	0.021	0.0027	1		04/30/19 16:59	78-93-3		
n-Butylbenzene	ND	mg/kg	0.0043	0.00027	1		04/30/19 16:59	104-51-8		
sec-Butylbenzene	ND	mg/kg	0.0043	0.00026	1		04/30/19 16:59	135-98-8		
tert-Butylbenzene	ND	mg/kg	0.0043	0.00035	1		04/30/19 16:59	98-06-6		
Carbon disulfide	ND	mg/kg	0.0086	0.00024	1		04/30/19 16:59	75-15-0		
Carbon tetrachloride	ND	mg/kg	0.0043	0.00029	1		04/30/19 16:59	56-23-5		
Chlorobenzene	ND	mg/kg	0.0043	0.00024	1		04/30/19 16:59	108-90-7		
Chloroethane	ND	mg/kg	0.0043	0.00041	1		04/30/19 16:59	75-00-3		
Chloroform	ND	mg/kg	0.0043	0.00025	1		04/30/19 16:59	67-66-3		
Chloromethane	ND	mg/kg	0.0043	0.0015	1		04/30/19 16:59	74-87-3		
2-Chlorotoluene	ND	mg/kg	0.0043	0.00028	1		04/30/19 16:59	95-49-8		
4-Chlorotoluene	ND	mg/kg	0.0043	0.00017	1		04/30/19 16:59	106-43-4		
Dibromochloromethane	ND	mg/kg	0.0043	0.00044	1		04/30/19 16:59	124-48-1		
1,2-Dibromoethane (EDB)	ND	mg/kg	0.0043	0.00032	1		04/30/19 16:59	106-93-4		
Dibromomethane	ND	mg/kg	0.0043	0.00037	1		04/30/19 16:59	74-95-3		
1,2-Dichlorobenzene	ND	mg/kg	0.0043	0.00034	1		04/30/19 16:59	95-50-1		
1,3-Dichlorobenzene	ND	mg/kg	0.0043	0.00025	1		04/30/19 16:59	541-73-1		
1,4-Dichlorobenzene	ND	mg/kg	0.0043	0.00030	1		04/30/19 16:59	106-46-7		
trans-1,4-Dichloro-2-butene	ND	mg/kg	0.086	0.00049	1		04/30/19 16:59	110-57-6		
Dichlorodifluoromethane	ND	mg/kg	0.0043	0.00018	1		04/30/19 16:59	75-71-8		
1,1-Dichloroethane	ND	mg/kg	0.0043	0.00024	1		04/30/19 16:59	75-34-3		
1,2-Dichloroethane	ND	mg/kg	0.0043	0.00032	1		04/30/19 16:59	107-06-2		
1,1-Dichloroethene	ND	mg/kg	0.0043	0.00034	1		04/30/19 16:59	75-35-4		
cis-1,2-Dichloroethene	ND	mg/kg	0.0043	0.00031	1		04/30/19 16:59	156-59-2		
trans-1,2-Dichloroethene	ND	mg/kg	0.0043	0.00031	1		04/30/19 16:59	156-60-5		
1,2-Dichloropropane	ND	mg/kg	0.0043	0.00025	1		04/30/19 16:59	78-87-5		
1,3-Dichloropropane	ND	mg/kg	0.0043	0.00034	1		04/30/19 16:59	142-28-9		
2,2-Dichloropropane	ND	mg/kg	0.0043	0.00021	1		04/30/19 16:59	594-20-7		
1,1-Dichloropropene	ND	mg/kg	0.0043	0.00021	1		04/30/19 16:59	563-58-6		
cis-1,3-Dichloropropene	ND	mg/kg	0.0043	0.00027	1		04/30/19 16:59	10061-01-5		
trans-1,3-Dichloropropene	ND	mg/kg	0.0043	0.00027	1		04/30/19 16:59	10061-02-6		

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB1126 Lab ID: 50223418002 Collected: 04/29/19 09:40 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report				Analyzed	CAS No.	Qual
			Limit	MDL	DF	Prepared			
8260 MSV 5035A VOA Analytical Method: EPA 8260									
Ethylbenzene	ND	mg/kg	0.0043	0.00021	1		04/30/19 16:59	100-41-4	
Ethyl methacrylate	ND	mg/kg	0.086	0.00068	1		04/30/19 16:59	97-63-2	
Hexachloro-1,3-butadiene	ND	mg/kg	0.0043	0.00024	1		04/30/19 16:59	87-68-3	
2-Hexanone	ND	mg/kg	0.086	0.0032	1		04/30/19 16:59	591-78-6	
Iodomethane	ND	mg/kg	0.086	0.00032	1		04/30/19 16:59	74-88-4	
Isopropylbenzene (Cumene)	ND	mg/kg	0.0043	0.00028	1		04/30/19 16:59	98-82-8	
p-Isopropyltoluene	ND	mg/kg	0.0043	0.00029	1		04/30/19 16:59	99-87-6	
Methylene Chloride	ND	mg/kg	0.017	0.0013	1		04/30/19 16:59	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	0.021	0.0030	1		04/30/19 16:59	108-10-1	
Methyl-tert-butyl ether	ND	mg/kg	0.0043	0.00043	1		04/30/19 16:59	1634-04-4	R1
Naphthalene	ND	mg/kg	0.0043	0.00070	1		04/30/19 16:59	91-20-3	
n-Propylbenzene	ND	mg/kg	0.0043	0.00024	1		04/30/19 16:59	103-65-1	
Styrene	ND	mg/kg	0.0043	0.00028	1		04/30/19 16:59	100-42-5	
1,1,1,2-Tetrachloroethane	ND	mg/kg	0.0043	0.00035	1		04/30/19 16:59	630-20-6	
1,1,2,2-Tetrachloroethane	ND	mg/kg	0.0043	0.00066	1		04/30/19 16:59	79-34-5	
Tetrachloroethene	0.0080	mg/kg	0.0043	0.00029	1		04/30/19 16:59	127-18-4	
Toluene	ND	mg/kg	0.0043	0.00043	1		04/30/19 16:59	108-88-3	
1,2,3-Trichlorobenzene	ND	mg/kg	0.0043	0.00029	1		04/30/19 16:59	87-61-6	
1,2,4-Trichlorobenzene	ND	mg/kg	0.0043	0.00048	1		04/30/19 16:59	120-82-1	
1,1,1-Trichloroethane	ND	mg/kg	0.0043	0.00025	1		04/30/19 16:59	71-55-6	
1,1,2-Trichloroethane	ND	mg/kg	0.0043	0.00047	1		04/30/19 16:59	79-00-5	
Trichloroethene	0.016	mg/kg	0.0043	0.00021	1		04/30/19 16:59	79-01-6	
Trichlorofluoromethane	ND	mg/kg	0.0043	0.00023	1		04/30/19 16:59	75-69-4	
1,2,3-Trichloropropane	ND	mg/kg	0.0043	0.00059	1		04/30/19 16:59	96-18-4	
1,2,4-Trimethylbenzene	ND	mg/kg	0.0043	0.00041	1		04/30/19 16:59	95-63-6	
1,3,5-Trimethylbenzene	ND	mg/kg	0.0043	0.00027	1		04/30/19 16:59	108-67-8	
Vinyl acetate	ND	mg/kg	0.086	0.0013	1		04/30/19 16:59	108-05-4	
Vinyl chloride	ND	mg/kg	0.0043	0.00027	1		04/30/19 16:59	75-01-4	
Xylene (Total)	ND	mg/kg	0.0086	0.00032	1		04/30/19 16:59	1330-20-7	
Surrogates									
Dibromofluoromethane (S)	111	%.	77-131		1		04/30/19 16:59	1868-53-7	
Toluene-d8 (S)	96	%.	77-127		1		04/30/19 16:59	2037-26-5	
4-Bromofluorobenzene (S)	96	%.	65-119		1		04/30/19 16:59	460-00-4	
Percent Moisture Analytical Method: SM 2540G									
Percent Moisture	10.6	%	0.10	0.10	1		04/30/19 14:26		
9012 Cyanide, Total Analytical Method: EPA 9012 Preparation Method: EPA 9012									
Cyanide	ND	mg/kg	0.28	0.16	1	05/02/19 18:20	05/02/19 21:16	57-12-5	

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB1516 Lab ID: 50223418003 Collected: 04/29/19 10:00 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report					CAS No.	Qual	
			Limit	MDL	DF	Prepared	Analyzed			
6020 MET ICPMS Analytical Method: EPA 6020 Preparation Method: EPA 3050B										
Cadmium	0.21	mg/kg	0.059	0.049	1	04/30/19 22:34	05/01/19 09:48	7440-43-9		
Chromium	13.3	mg/kg	1.2	0.61	5	04/30/19 22:34	05/01/19 08:22	7440-47-3		
Nickel	19.5	mg/kg	0.29	0.18	5	04/30/19 22:34	05/01/19 08:22	7440-02-0		
8260 MSV 5035A VOA Analytical Method: EPA 8260										
Acetone	ND	mg/kg	0.087	0.013	1		04/30/19 18:54	67-64-1		
Acrolein	ND	mg/kg	0.087	0.0072	1		04/30/19 18:54	107-02-8		
Acrylonitrile	ND	mg/kg	0.087	0.0020	1		04/30/19 18:54	107-13-1		
Benzene	ND	mg/kg	0.0044	0.00017	1		04/30/19 18:54	71-43-2		
Bromobenzene	ND	mg/kg	0.0044	0.00032	1		04/30/19 18:54	108-86-1		
Bromochloromethane	ND	mg/kg	0.0044	0.00038	1		04/30/19 18:54	74-97-5		
Bromodichloromethane	ND	mg/kg	0.0044	0.00033	1		04/30/19 18:54	75-27-4		
Bromoform	ND	mg/kg	0.0044	0.00057	1		04/30/19 18:54	75-25-2		
Bromomethane	ND	mg/kg	0.0044	0.00075	1		04/30/19 18:54	74-83-9		
2-Butanone (MEK)	ND	mg/kg	0.022	0.0028	1		04/30/19 18:54	78-93-3		
n-Butylbenzene	ND	mg/kg	0.0044	0.00028	1		04/30/19 18:54	104-51-8		
sec-Butylbenzene	ND	mg/kg	0.0044	0.00026	1		04/30/19 18:54	135-98-8		
tert-Butylbenzene	ND	mg/kg	0.0044	0.00036	1		04/30/19 18:54	98-06-6		
Carbon disulfide	ND	mg/kg	0.0087	0.00024	1		04/30/19 18:54	75-15-0		
Carbon tetrachloride	ND	mg/kg	0.0044	0.00030	1		04/30/19 18:54	56-23-5		
Chlorobenzene	ND	mg/kg	0.0044	0.00024	1		04/30/19 18:54	108-90-7		
Chloroethane	ND	mg/kg	0.0044	0.00042	1		04/30/19 18:54	75-00-3		
Chloroform	ND	mg/kg	0.0044	0.00025	1		04/30/19 18:54	67-66-3		
Chloromethane	ND	mg/kg	0.0044	0.0016	1		04/30/19 18:54	74-87-3		
2-Chlorotoluene	ND	mg/kg	0.0044	0.00029	1		04/30/19 18:54	95-49-8		
4-Chlorotoluene	ND	mg/kg	0.0044	0.00017	1		04/30/19 18:54	106-43-4		
Dibromochloromethane	ND	mg/kg	0.0044	0.00045	1		04/30/19 18:54	124-48-1		
1,2-Dibromoethane (EDB)	ND	mg/kg	0.0044	0.00033	1		04/30/19 18:54	106-93-4		
Dibromomethane	ND	mg/kg	0.0044	0.00038	1		04/30/19 18:54	74-95-3		
1,2-Dichlorobenzene	ND	mg/kg	0.0044	0.00035	1		04/30/19 18:54	95-50-1		
1,3-Dichlorobenzene	ND	mg/kg	0.0044	0.00025	1		04/30/19 18:54	541-73-1		
1,4-Dichlorobenzene	ND	mg/kg	0.0044	0.00031	1		04/30/19 18:54	106-46-7		
trans-1,4-Dichloro-2-butene	ND	mg/kg	0.087	0.00050	1		04/30/19 18:54	110-57-6		
Dichlorodifluoromethane	ND	mg/kg	0.0044	0.00018	1		04/30/19 18:54	75-71-8		
1,1-Dichloroethane	ND	mg/kg	0.0044	0.00024	1		04/30/19 18:54	75-34-3		
1,2-Dichloroethane	ND	mg/kg	0.0044	0.00033	1		04/30/19 18:54	107-06-2		
1,1-Dichloroethene	ND	mg/kg	0.0044	0.00035	1		04/30/19 18:54	75-35-4		
cis-1,2-Dichloroethene	ND	mg/kg	0.0044	0.00031	1		04/30/19 18:54	156-59-2		
trans-1,2-Dichloroethene	ND	mg/kg	0.0044	0.00031	1		04/30/19 18:54	156-60-5		
1,2-Dichloropropane	ND	mg/kg	0.0044	0.00025	1		04/30/19 18:54	78-87-5		
1,3-Dichloropropane	ND	mg/kg	0.0044	0.00035	1		04/30/19 18:54	142-28-9		
2,2-Dichloropropane	ND	mg/kg	0.0044	0.00021	1		04/30/19 18:54	594-20-7		
1,1-Dichloropropene	ND	mg/kg	0.0044	0.00021	1		04/30/19 18:54	563-58-6		
cis-1,3-Dichloropropene	ND	mg/kg	0.0044	0.00028	1		04/30/19 18:54	10061-01-5		
trans-1,3-Dichloropropene	ND	mg/kg	0.0044	0.00027	1		04/30/19 18:54	10061-02-6		

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB1516 Lab ID: 50223418003 Collected: 04/29/19 10:00 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report				Analyzed	CAS No.	Qual
			Limit	MDL	DF	Prepared			
8260 MSV 5035A VOA Analytical Method: EPA 8260									
Ethylbenzene	ND	mg/kg	0.0044	0.00021	1		04/30/19 18:54	100-41-4	
Ethyl methacrylate	ND	mg/kg	0.087	0.00069	1		04/30/19 18:54	97-63-2	
Hexachloro-1,3-butadiene	ND	mg/kg	0.0044	0.00024	1		04/30/19 18:54	87-68-3	
2-Hexanone	ND	mg/kg	0.087	0.0033	1		04/30/19 18:54	591-78-6	
Iodomethane	ND	mg/kg	0.087	0.00033	1		04/30/19 18:54	74-88-4	
Isopropylbenzene (Cumene)	ND	mg/kg	0.0044	0.00029	1		04/30/19 18:54	98-82-8	
p-Isopropyltoluene	ND	mg/kg	0.0044	0.00030	1		04/30/19 18:54	99-87-6	
Methylene Chloride	ND	mg/kg	0.017	0.0013	1		04/30/19 18:54	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	0.022	0.0031	1		04/30/19 18:54	108-10-1	
Methyl-tert-butyl ether	ND	mg/kg	0.0044	0.00044	1		04/30/19 18:54	1634-04-4	
Naphthalene	ND	mg/kg	0.0044	0.00072	1		04/30/19 18:54	91-20-3	
n-Propylbenzene	ND	mg/kg	0.0044	0.00024	1		04/30/19 18:54	103-65-1	
Styrene	ND	mg/kg	0.0044	0.00029	1		04/30/19 18:54	100-42-5	
1,1,1,2-Tetrachloroethane	ND	mg/kg	0.0044	0.00036	1		04/30/19 18:54	630-20-6	
1,1,2,2-Tetrachloroethane	ND	mg/kg	0.0044	0.00067	1		04/30/19 18:54	79-34-5	
Tetrachloroethene	0.0083	mg/kg	0.0044	0.00030	1		04/30/19 18:54	127-18-4	
Toluene	ND	mg/kg	0.0044	0.00044	1		04/30/19 18:54	108-88-3	
1,2,3-Trichlorobenzene	ND	mg/kg	0.0044	0.00030	1		04/30/19 18:54	87-61-6	
1,2,4-Trichlorobenzene	ND	mg/kg	0.0044	0.00049	1		04/30/19 18:54	120-82-1	
1,1,1-Trichloroethane	ND	mg/kg	0.0044	0.00025	1		04/30/19 18:54	71-55-6	
1,1,2-Trichloroethane	ND	mg/kg	0.0044	0.00048	1		04/30/19 18:54	79-00-5	
Trichloroethene	0.0093	mg/kg	0.0044	0.00022	1		04/30/19 18:54	79-01-6	
Trichlorofluoromethane	ND	mg/kg	0.0044	0.00024	1		04/30/19 18:54	75-69-4	
1,2,3-Trichloropropane	ND	mg/kg	0.0044	0.00060	1		04/30/19 18:54	96-18-4	
1,2,4-Trimethylbenzene	ND	mg/kg	0.0044	0.00042	1		04/30/19 18:54	95-63-6	
1,3,5-Trimethylbenzene	ND	mg/kg	0.0044	0.00027	1		04/30/19 18:54	108-67-8	
Vinyl acetate	ND	mg/kg	0.087	0.0013	1		04/30/19 18:54	108-05-4	
Vinyl chloride	ND	mg/kg	0.0044	0.00027	1		04/30/19 18:54	75-01-4	
Xylene (Total)	ND	mg/kg	0.0087	0.00033	1		04/30/19 18:54	1330-20-7	
Surrogates									
Dibromofluoromethane (S)	113	%.	77-131		1		04/30/19 18:54	1868-53-7	
Toluene-d8 (S)	97	%.	77-127		1		04/30/19 18:54	2037-26-5	
4-Bromofluorobenzene (S)	96	%.	65-119		1		04/30/19 18:54	460-00-4	
Percent Moisture Analytical Method: SM 2540G									
Percent Moisture	17.0	%	0.10	0.10	1		04/30/19 14:26		
9012 Cyanide, Total Analytical Method: EPA 9012 Preparation Method: EPA 9012									
Cyanide	ND	mg/kg	0.30	0.17	1	05/02/19 18:20	05/02/19 21:22	57-12-5	

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB1044 Lab ID: 50223418004 Collected: 04/29/19 14:15 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report					CAS No.	Qual	
			Limit	MDL	DF	Prepared	Analyzed			
6020 MET ICPMS Analytical Method: EPA 6020 Preparation Method: EPA 3050B										
Cadmium	0.13	mg/kg	0.055	0.046	1	04/30/19 22:34	05/01/19 09:52	7440-43-9		
Chromium	11.4	mg/kg	1.1	0.58	5	04/30/19 22:34	05/01/19 08:26	7440-47-3		
Nickel	13.3	mg/kg	0.28	0.17	5	04/30/19 22:34	05/01/19 08:26	7440-02-0		
8260 MSV 5035A VOA Analytical Method: EPA 8260										
Acetone	ND	mg/kg	0.089	0.013	1		04/30/19 19:32	67-64-1		
Acrolein	ND	mg/kg	0.089	0.0074	1		04/30/19 19:32	107-02-8		
Acrylonitrile	ND	mg/kg	0.089	0.0020	1		04/30/19 19:32	107-13-1		
Benzene	ND	mg/kg	0.0045	0.00017	1		04/30/19 19:32	71-43-2		
Bromobenzene	ND	mg/kg	0.0045	0.00033	1		04/30/19 19:32	108-86-1		
Bromochloromethane	ND	mg/kg	0.0045	0.00039	1		04/30/19 19:32	74-97-5		
Bromodichloromethane	ND	mg/kg	0.0045	0.00034	1		04/30/19 19:32	75-27-4		
Bromoform	ND	mg/kg	0.0045	0.00058	1		04/30/19 19:32	75-25-2		
Bromomethane	ND	mg/kg	0.0045	0.00077	1		04/30/19 19:32	74-83-9		
2-Butanone (MEK)	ND	mg/kg	0.022	0.0029	1		04/30/19 19:32	78-93-3		
n-Butylbenzene	ND	mg/kg	0.0045	0.00029	1		04/30/19 19:32	104-51-8		
sec-Butylbenzene	ND	mg/kg	0.0045	0.00027	1		04/30/19 19:32	135-98-8		
tert-Butylbenzene	ND	mg/kg	0.0045	0.00037	1		04/30/19 19:32	98-06-6		
Carbon disulfide	ND	mg/kg	0.0089	0.00025	1		04/30/19 19:32	75-15-0		
Carbon tetrachloride	ND	mg/kg	0.0045	0.00030	1		04/30/19 19:32	56-23-5		
Chlorobenzene	ND	mg/kg	0.0045	0.00025	1		04/30/19 19:32	108-90-7		
Chloroethane	ND	mg/kg	0.0045	0.00043	1		04/30/19 19:32	75-00-3		
Chloroform	ND	mg/kg	0.0045	0.00026	1		04/30/19 19:32	67-66-3		
Chloromethane	ND	mg/kg	0.0045	0.0016	1		04/30/19 19:32	74-87-3		
2-Chlorotoluene	ND	mg/kg	0.0045	0.00029	1		04/30/19 19:32	95-49-8		
4-Chlorotoluene	ND	mg/kg	0.0045	0.00018	1		04/30/19 19:32	106-43-4		
Dibromochloromethane	ND	mg/kg	0.0045	0.00045	1		04/30/19 19:32	124-48-1		
1,2-Dibromoethane (EDB)	ND	mg/kg	0.0045	0.00034	1		04/30/19 19:32	106-93-4		
Dibromomethane	ND	mg/kg	0.0045	0.00038	1		04/30/19 19:32	74-95-3		
1,2-Dichlorobenzene	ND	mg/kg	0.0045	0.00036	1		04/30/19 19:32	95-50-1		
1,3-Dichlorobenzene	ND	mg/kg	0.0045	0.00026	1		04/30/19 19:32	541-73-1		
1,4-Dichlorobenzene	ND	mg/kg	0.0045	0.00031	1		04/30/19 19:32	106-46-7		
trans-1,4-Dichloro-2-butene	ND	mg/kg	0.089	0.00051	1		04/30/19 19:32	110-57-6		
Dichlorodifluoromethane	ND	mg/kg	0.0045	0.00019	1		04/30/19 19:32	75-71-8		
1,1-Dichloroethane	ND	mg/kg	0.0045	0.00025	1		04/30/19 19:32	75-34-3		
1,2-Dichloroethane	ND	mg/kg	0.0045	0.00034	1		04/30/19 19:32	107-06-2		
1,1-Dichloroethene	ND	mg/kg	0.0045	0.00036	1		04/30/19 19:32	75-35-4		
cis-1,2-Dichloroethene	ND	mg/kg	0.0045	0.00032	1		04/30/19 19:32	156-59-2		
trans-1,2-Dichloroethene	ND	mg/kg	0.0045	0.00032	1		04/30/19 19:32	156-60-5		
1,2-Dichloropropane	ND	mg/kg	0.0045	0.00026	1		04/30/19 19:32	78-87-5		
1,3-Dichloropropane	ND	mg/kg	0.0045	0.00036	1		04/30/19 19:32	142-28-9		
2,2-Dichloropropane	ND	mg/kg	0.0045	0.00021	1		04/30/19 19:32	594-20-7		
1,1-Dichloropropene	ND	mg/kg	0.0045	0.00021	1		04/30/19 19:32	563-58-6		
cis-1,3-Dichloropropene	ND	mg/kg	0.0045	0.00029	1		04/30/19 19:32	10061-01-5		
trans-1,3-Dichloropropene	ND	mg/kg	0.0045	0.00028	1		04/30/19 19:32	10061-02-6		

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB1044 Lab ID: 50223418004 Collected: 04/29/19 14:15 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report				Prepared	Analyzed	CAS No.	Qual
			Limit	MDL	DF					
8260 MSV 5035A VOA Analytical Method: EPA 8260										
Ethylbenzene	ND	mg/kg	0.0045	0.00021	1		04/30/19 19:32	100-41-4		
Ethyl methacrylate	ND	mg/kg	0.089	0.00070	1		04/30/19 19:32	97-63-2		
Hexachloro-1,3-butadiene	ND	mg/kg	0.0045	0.00025	1		04/30/19 19:32	87-68-3		
2-Hexanone	ND	mg/kg	0.089	0.0034	1		04/30/19 19:32	591-78-6		
Iodomethane	ND	mg/kg	0.089	0.00034	1		04/30/19 19:32	74-88-4		
Isopropylbenzene (Cumene)	ND	mg/kg	0.0045	0.00029	1		04/30/19 19:32	98-82-8		
p-Isopropyltoluene	ND	mg/kg	0.0045	0.00030	1		04/30/19 19:32	99-87-6		
Methylene Chloride	ND	mg/kg	0.018	0.0013	1		04/30/19 19:32	75-09-2		
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	0.022	0.0031	1		04/30/19 19:32	108-10-1		
Methyl-tert-butyl ether	ND	mg/kg	0.0045	0.00045	1		04/30/19 19:32	1634-04-4		
Naphthalene	ND	mg/kg	0.0045	0.00073	1		04/30/19 19:32	91-20-3		
n-Propylbenzene	ND	mg/kg	0.0045	0.00025	1		04/30/19 19:32	103-65-1		
Styrene	ND	mg/kg	0.0045	0.00029	1		04/30/19 19:32	100-42-5		
1,1,1,2-Tetrachloroethane	ND	mg/kg	0.0045	0.00037	1		04/30/19 19:32	630-20-6		
1,1,2,2-Tetrachloroethane	ND	mg/kg	0.0045	0.00069	1		04/30/19 19:32	79-34-5		
Tetrachloroethene	ND	mg/kg	0.0045	0.00030	1		04/30/19 19:32	127-18-4		
Toluene	ND	mg/kg	0.0045	0.00045	1		04/30/19 19:32	108-88-3		
1,2,3-Trichlorobenzene	ND	mg/kg	0.0045	0.00030	1		04/30/19 19:32	87-61-6		
1,2,4-Trichlorobenzene	ND	mg/kg	0.0045	0.00050	1		04/30/19 19:32	120-82-1		
1,1,1-Trichloroethane	ND	mg/kg	0.0045	0.00026	1		04/30/19 19:32	71-55-6		
1,1,2-Trichloroethane	ND	mg/kg	0.0045	0.00049	1		04/30/19 19:32	79-00-5		
Trichloroethene	0.0069	mg/kg	0.0045	0.00022	1		04/30/19 19:32	79-01-6		
Trichlorofluoromethane	ND	mg/kg	0.0045	0.00024	1		04/30/19 19:32	75-69-4		
1,2,3-Trichloropropane	ND	mg/kg	0.0045	0.00061	1		04/30/19 19:32	96-18-4		
1,2,4-Trimethylbenzene	ND	mg/kg	0.0045	0.00043	1		04/30/19 19:32	95-63-6		
1,3,5-Trimethylbenzene	ND	mg/kg	0.0045	0.00028	1		04/30/19 19:32	108-67-8		
Vinyl acetate	ND	mg/kg	0.089	0.0013	1		04/30/19 19:32	108-05-4		
Vinyl chloride	ND	mg/kg	0.0045	0.00028	1		04/30/19 19:32	75-01-4		
Xylene (Total)	ND	mg/kg	0.0089	0.00034	1		04/30/19 19:32	1330-20-7		
Surrogates										
Dibromofluoromethane (S)	112	%.	77-131		1		04/30/19 19:32	1868-53-7		
Toluene-d8 (S)	97	%.	77-127		1		04/30/19 19:32	2037-26-5		
4-Bromofluorobenzene (S)	97	%.	65-119		1		04/30/19 19:32	460-00-4		
Percent Moisture Analytical Method: SM 2540G										
Percent Moisture	12.0	%	0.10	0.10	1		04/30/19 14:26			
9012 Cyanide, Total Analytical Method: EPA 9012 Preparation Method: EPA 9012										
Cyanide	ND	mg/kg	0.28	0.16	1	05/02/19 18:20	05/02/19 21:23	57-12-5		

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB1050 Lab ID: 50223418005 Collected: 04/29/19 15:50 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report					CAS No.	Qual	
			Limit	MDL	DF	Prepared	Analyzed			
6020 MET ICPMS Analytical Method: EPA 6020 Preparation Method: EPA 3050B										
Cadmium	0.17	mg/kg	0.054	0.045	1	04/30/19 22:34	05/01/19 10:02	7440-43-9		
Chromium	15.1	mg/kg	1.1	0.57	5	04/30/19 22:34	05/01/19 08:31	7440-47-3		
Nickel	17.3	mg/kg	0.27	0.17	5	04/30/19 22:34	05/01/19 08:31	7440-02-0		
8260 MSV 5035A VOA Analytical Method: EPA 8260										
Acetone	ND	mg/kg	0.086	0.013	1		04/30/19 20:10	67-64-1		
Acrolein	ND	mg/kg	0.086	0.0071	1		04/30/19 20:10	107-02-8		
Acrylonitrile	ND	mg/kg	0.086	0.0020	1		04/30/19 20:10	107-13-1		
Benzene	ND	mg/kg	0.0043	0.00016	1		04/30/19 20:10	71-43-2		
Bromobenzene	ND	mg/kg	0.0043	0.00032	1		04/30/19 20:10	108-86-1		
Bromochloromethane	ND	mg/kg	0.0043	0.00038	1		04/30/19 20:10	74-97-5		
Bromodichloromethane	ND	mg/kg	0.0043	0.00033	1		04/30/19 20:10	75-27-4		
Bromoform	ND	mg/kg	0.0043	0.00056	1		04/30/19 20:10	75-25-2		
Bromomethane	ND	mg/kg	0.0043	0.00074	1		04/30/19 20:10	74-83-9		
2-Butanone (MEK)	ND	mg/kg	0.021	0.0027	1		04/30/19 20:10	78-93-3		
n-Butylbenzene	ND	mg/kg	0.0043	0.00027	1		04/30/19 20:10	104-51-8		
sec-Butylbenzene	ND	mg/kg	0.0043	0.00026	1		04/30/19 20:10	135-98-8		
tert-Butylbenzene	ND	mg/kg	0.0043	0.00035	1		04/30/19 20:10	98-06-6		
Carbon disulfide	ND	mg/kg	0.0086	0.00024	1		04/30/19 20:10	75-15-0		
Carbon tetrachloride	ND	mg/kg	0.0043	0.00029	1		04/30/19 20:10	56-23-5		
Chlorobenzene	ND	mg/kg	0.0043	0.00024	1		04/30/19 20:10	108-90-7		
Chloroethane	ND	mg/kg	0.0043	0.00041	1		04/30/19 20:10	75-00-3		
Chloroform	ND	mg/kg	0.0043	0.00025	1		04/30/19 20:10	67-66-3		
Chloromethane	ND	mg/kg	0.0043	0.0015	1		04/30/19 20:10	74-87-3		
2-Chlorotoluene	ND	mg/kg	0.0043	0.00028	1		04/30/19 20:10	95-49-8		
4-Chlorotoluene	ND	mg/kg	0.0043	0.00017	1		04/30/19 20:10	106-43-4		
Dibromochloromethane	ND	mg/kg	0.0043	0.00044	1		04/30/19 20:10	124-48-1		
1,2-Dibromoethane (EDB)	ND	mg/kg	0.0043	0.00033	1		04/30/19 20:10	106-93-4		
Dibromomethane	ND	mg/kg	0.0043	0.00037	1		04/30/19 20:10	74-95-3		
1,2-Dichlorobenzene	ND	mg/kg	0.0043	0.00034	1		04/30/19 20:10	95-50-1		
1,3-Dichlorobenzene	ND	mg/kg	0.0043	0.00025	1		04/30/19 20:10	541-73-1		
1,4-Dichlorobenzene	ND	mg/kg	0.0043	0.00030	1		04/30/19 20:10	106-46-7		
trans-1,4-Dichloro-2-butene	ND	mg/kg	0.086	0.00049	1		04/30/19 20:10	110-57-6		
Dichlorodifluoromethane	ND	mg/kg	0.0043	0.00018	1		04/30/19 20:10	75-71-8		
1,1-Dichloroethane	ND	mg/kg	0.0043	0.00024	1		04/30/19 20:10	75-34-3		
1,2-Dichloroethane	ND	mg/kg	0.0043	0.00033	1		04/30/19 20:10	107-06-2		
1,1-Dichloroethene	ND	mg/kg	0.0043	0.00034	1		04/30/19 20:10	75-35-4		
cis-1,2-Dichloroethene	ND	mg/kg	0.0043	0.00031	1		04/30/19 20:10	156-59-2		
trans-1,2-Dichloroethene	ND	mg/kg	0.0043	0.00031	1		04/30/19 20:10	156-60-5		
1,2-Dichloropropane	ND	mg/kg	0.0043	0.00025	1		04/30/19 20:10	78-87-5		
1,3-Dichloropropane	ND	mg/kg	0.0043	0.00034	1		04/30/19 20:10	142-28-9		
2,2-Dichloropropane	ND	mg/kg	0.0043	0.00021	1		04/30/19 20:10	594-20-7		
1,1-Dichloropropene	ND	mg/kg	0.0043	0.00021	1		04/30/19 20:10	563-58-6		
cis-1,3-Dichloropropene	ND	mg/kg	0.0043	0.00027	1		04/30/19 20:10	10061-01-5		
trans-1,3-Dichloropropene	ND	mg/kg	0.0043	0.00027	1		04/30/19 20:10	10061-02-6		

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB1050 Lab ID: 50223418005 Collected: 04/29/19 15:50 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report				Analyzed	CAS No.	Qual
			Limit	MDL	DF	Prepared			
8260 MSV 5035A VOA Analytical Method: EPA 8260									
Ethylbenzene	ND	mg/kg	0.0043	0.00021	1		04/30/19 20:10	100-41-4	
Ethyl methacrylate	ND	mg/kg	0.086	0.00068	1		04/30/19 20:10	97-63-2	
Hexachloro-1,3-butadiene	ND	mg/kg	0.0043	0.00024	1		04/30/19 20:10	87-68-3	
2-Hexanone	ND	mg/kg	0.086	0.0033	1		04/30/19 20:10	591-78-6	
Iodomethane	ND	mg/kg	0.086	0.00033	1		04/30/19 20:10	74-88-4	
Isopropylbenzene (Cumene)	ND	mg/kg	0.0043	0.00028	1		04/30/19 20:10	98-82-8	
p-Isopropyltoluene	ND	mg/kg	0.0043	0.00029	1		04/30/19 20:10	99-87-6	
Methylene Chloride	ND	mg/kg	0.017	0.0013	1		04/30/19 20:10	75-09-2	
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	0.021	0.0030	1		04/30/19 20:10	108-10-1	
Methyl-tert-butyl ether	ND	mg/kg	0.0043	0.00043	1		04/30/19 20:10	1634-04-4	
Naphthalene	ND	mg/kg	0.0043	0.00070	1		04/30/19 20:10	91-20-3	
n-Propylbenzene	ND	mg/kg	0.0043	0.00024	1		04/30/19 20:10	103-65-1	
Styrene	ND	mg/kg	0.0043	0.00028	1		04/30/19 20:10	100-42-5	
1,1,1,2-Tetrachloroethane	ND	mg/kg	0.0043	0.00035	1		04/30/19 20:10	630-20-6	
1,1,2,2-Tetrachloroethane	ND	mg/kg	0.0043	0.00066	1		04/30/19 20:10	79-34-5	
Tetrachloroethene	ND	mg/kg	0.0043	0.00029	1		04/30/19 20:10	127-18-4	
Toluene	ND	mg/kg	0.0043	0.00043	1		04/30/19 20:10	108-88-3	
1,2,3-Trichlorobenzene	ND	mg/kg	0.0043	0.00029	1		04/30/19 20:10	87-61-6	
1,2,4-Trichlorobenzene	ND	mg/kg	0.0043	0.00048	1		04/30/19 20:10	120-82-1	
1,1,1-Trichloroethane	ND	mg/kg	0.0043	0.00025	1		04/30/19 20:10	71-55-6	
1,1,2-Trichloroethane	ND	mg/kg	0.0043	0.00047	1		04/30/19 20:10	79-00-5	
Trichloroethene	0.0097	mg/kg	0.0043	0.00021	1		04/30/19 20:10	79-01-6	
Trichlorofluoromethane	ND	mg/kg	0.0043	0.00023	1		04/30/19 20:10	75-69-4	
1,2,3-Trichloropropane	ND	mg/kg	0.0043	0.00059	1		04/30/19 20:10	96-18-4	
1,2,4-Trimethylbenzene	ND	mg/kg	0.0043	0.00041	1		04/30/19 20:10	95-63-6	
1,3,5-Trimethylbenzene	ND	mg/kg	0.0043	0.00027	1		04/30/19 20:10	108-67-8	
Vinyl acetate	ND	mg/kg	0.086	0.0013	1		04/30/19 20:10	108-05-4	
Vinyl chloride	ND	mg/kg	0.0043	0.00027	1		04/30/19 20:10	75-01-4	
Xylene (Total)	ND	mg/kg	0.0086	0.00033	1		04/30/19 20:10	1330-20-7	
Surrogates									
Dibromofluoromethane (S)	119	%.	77-131		1		04/30/19 20:10	1868-53-7	
Toluene-d8 (S)	95	%.	77-127		1		04/30/19 20:10	2037-26-5	
4-Bromofluorobenzene (S)	97	%.	65-119		1		04/30/19 20:10	460-00-4	
Percent Moisture Analytical Method: SM 2540G									
Percent Moisture	13.0	%	0.10	0.10	1		04/30/19 14:26		
9012 Cyanide, Total Analytical Method: EPA 9012 Preparation Method: EPA 9012									
Cyanide	ND	mg/kg	0.29	0.16	1	05/02/19 18:20	05/02/19 21:24	57-12-5	

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB-FD1 Lab ID: 50223418006 Collected: 04/29/19 08:00 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report					CAS No.	Qual	
			Limit	MDL	DF	Prepared	Analyzed			
6020 MET ICPMS Analytical Method: EPA 6020 Preparation Method: EPA 3050B										
Cadmium	0.12	mg/kg	0.055	0.046	1	04/30/19 22:34	05/01/19 10:15	7440-43-9		
Chromium	11.6	mg/kg	1.1	0.57	5	04/30/19 22:34	05/01/19 08:35	7440-47-3		
Nickel	14.3	mg/kg	0.27	0.17	5	04/30/19 22:34	05/01/19 08:35	7440-02-0		
8260 MSV 5035A VOA Analytical Method: EPA 8260										
Acetone	ND	mg/kg	0.080	0.012	1		04/30/19 20:49	67-64-1		
Acrolein	ND	mg/kg	0.080	0.0066	1		04/30/19 20:49	107-02-8		
Acrylonitrile	ND	mg/kg	0.080	0.0018	1		04/30/19 20:49	107-13-1		
Benzene	ND	mg/kg	0.0040	0.00015	1		04/30/19 20:49	71-43-2		
Bromobenzene	ND	mg/kg	0.0040	0.00029	1		04/30/19 20:49	108-86-1		
Bromochloromethane	ND	mg/kg	0.0040	0.00035	1		04/30/19 20:49	74-97-5		
Bromodichloromethane	ND	mg/kg	0.0040	0.00030	1		04/30/19 20:49	75-27-4		
Bromoform	ND	mg/kg	0.0040	0.00052	1		04/30/19 20:49	75-25-2		
Bromomethane	ND	mg/kg	0.0040	0.00068	1		04/30/19 20:49	74-83-9		
2-Butanone (MEK)	ND	mg/kg	0.020	0.0025	1		04/30/19 20:49	78-93-3		
n-Butylbenzene	ND	mg/kg	0.0040	0.00025	1		04/30/19 20:49	104-51-8		
sec-Butylbenzene	ND	mg/kg	0.0040	0.00024	1		04/30/19 20:49	135-98-8		
tert-Butylbenzene	ND	mg/kg	0.0040	0.00033	1		04/30/19 20:49	98-06-6		
Carbon disulfide	ND	mg/kg	0.0080	0.00022	1		04/30/19 20:49	75-15-0		
Carbon tetrachloride	ND	mg/kg	0.0040	0.00027	1		04/30/19 20:49	56-23-5		
Chlorobenzene	ND	mg/kg	0.0040	0.00022	1		04/30/19 20:49	108-90-7		
Chloroethane	ND	mg/kg	0.0040	0.00038	1		04/30/19 20:49	75-00-3		
Chloroform	ND	mg/kg	0.0040	0.00023	1		04/30/19 20:49	67-66-3		
Chloromethane	ND	mg/kg	0.0040	0.0014	1		04/30/19 20:49	74-87-3		
2-Chlorotoluene	ND	mg/kg	0.0040	0.00026	1		04/30/19 20:49	95-49-8		
4-Chlorotoluene	ND	mg/kg	0.0040	0.00016	1		04/30/19 20:49	106-43-4		
Dibromochloromethane	ND	mg/kg	0.0040	0.00041	1		04/30/19 20:49	124-48-1		
1,2-Dibromoethane (EDB)	ND	mg/kg	0.0040	0.00030	1		04/30/19 20:49	106-93-4		
Dibromomethane	ND	mg/kg	0.0040	0.00034	1		04/30/19 20:49	74-95-3		
1,2-Dichlorobenzene	ND	mg/kg	0.0040	0.00032	1		04/30/19 20:49	95-50-1		
1,3-Dichlorobenzene	ND	mg/kg	0.0040	0.00023	1		04/30/19 20:49	541-73-1		
1,4-Dichlorobenzene	ND	mg/kg	0.0040	0.00028	1		04/30/19 20:49	106-46-7		
trans-1,4-Dichloro-2-butene	ND	mg/kg	0.080	0.00045	1		04/30/19 20:49	110-57-6		
Dichlorodifluoromethane	ND	mg/kg	0.0040	0.00017	1		04/30/19 20:49	75-71-8		
1,1-Dichloroethane	ND	mg/kg	0.0040	0.00022	1		04/30/19 20:49	75-34-3		
1,2-Dichloroethane	ND	mg/kg	0.0040	0.00030	1		04/30/19 20:49	107-06-2		
1,1-Dichloroethene	ND	mg/kg	0.0040	0.00032	1		04/30/19 20:49	75-35-4		
cis-1,2-Dichloroethene	ND	mg/kg	0.0040	0.00029	1		04/30/19 20:49	156-59-2		
trans-1,2-Dichloroethene	ND	mg/kg	0.0040	0.00029	1		04/30/19 20:49	156-60-5		
1,2-Dichloropropane	ND	mg/kg	0.0040	0.00023	1		04/30/19 20:49	78-87-5		
1,3-Dichloropropane	ND	mg/kg	0.0040	0.00032	1		04/30/19 20:49	142-28-9		
2,2-Dichloropropane	ND	mg/kg	0.0040	0.00019	1		04/30/19 20:49	594-20-7		
1,1-Dichloropropene	ND	mg/kg	0.0040	0.00019	1		04/30/19 20:49	563-58-6		
cis-1,3-Dichloropropene	ND	mg/kg	0.0040	0.00025	1		04/30/19 20:49	10061-01-5		
trans-1,3-Dichloropropene	ND	mg/kg	0.0040	0.00025	1		04/30/19 20:49	10061-02-6		

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB-FD1 Lab ID: 50223418006 Collected: 04/29/19 08:00 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "dry weight" basis and are adjusted for percent moisture, sample size and any dilutions.

Parameters	Results	Units	Report				Prepared	Analyzed	CAS No.	Qual
			Limit	MDL	DF					
8260 MSV 5035A VOA	Analytical Method: EPA 8260									
Ethylbenzene	ND	mg/kg	0.0040	0.00019	1		04/30/19 20:49	100-41-4		
Ethyl methacrylate	ND	mg/kg	0.080	0.00063	1		04/30/19 20:49	97-63-2		
Hexachloro-1,3-butadiene	ND	mg/kg	0.0040	0.00022	1		04/30/19 20:49	87-68-3		
2-Hexanone	ND	mg/kg	0.080	0.0030	1		04/30/19 20:49	591-78-6		
Iodomethane	ND	mg/kg	0.080	0.00030	1		04/30/19 20:49	74-88-4		
Isopropylbenzene (Cumene)	ND	mg/kg	0.0040	0.00026	1		04/30/19 20:49	98-82-8		
p-Isopropyltoluene	ND	mg/kg	0.0040	0.00027	1		04/30/19 20:49	99-87-6		
Methylene Chloride	ND	mg/kg	0.016	0.0012	1		04/30/19 20:49	75-09-2		
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	0.020	0.0028	1		04/30/19 20:49	108-10-1		
Methyl-tert-butyl ether	ND	mg/kg	0.0040	0.00040	1		04/30/19 20:49	1634-04-4		
Naphthalene	ND	mg/kg	0.0040	0.00065	1		04/30/19 20:49	91-20-3		
n-Propylbenzene	ND	mg/kg	0.0040	0.00022	1		04/30/19 20:49	103-65-1		
Styrene	ND	mg/kg	0.0040	0.00026	1		04/30/19 20:49	100-42-5		
1,1,1,2-Tetrachloroethane	ND	mg/kg	0.0040	0.00033	1		04/30/19 20:49	630-20-6		
1,1,2,2-Tetrachloroethane	ND	mg/kg	0.0040	0.00061	1		04/30/19 20:49	79-34-5		
Tetrachloroethene	0.0083	mg/kg	0.0040	0.00027	1		04/30/19 20:49	127-18-4		
Toluene	ND	mg/kg	0.0040	0.00040	1		04/30/19 20:49	108-88-3		
1,2,3-Trichlorobenzene	ND	mg/kg	0.0040	0.00027	1		04/30/19 20:49	87-61-6		
1,2,4-Trichlorobenzene	ND	mg/kg	0.0040	0.00045	1		04/30/19 20:49	120-82-1		
1,1,1-Trichloroethane	ND	mg/kg	0.0040	0.00023	1		04/30/19 20:49	71-55-6		
1,1,2-Trichloroethane	ND	mg/kg	0.0040	0.00044	1		04/30/19 20:49	79-00-5		
Trichloroethene	0.0095	mg/kg	0.0040	0.00020	1		04/30/19 20:49	79-01-6		
Trichlorofluoromethane	ND	mg/kg	0.0040	0.00022	1		04/30/19 20:49	75-69-4		
1,2,3-Trichloropropane	ND	mg/kg	0.0040	0.00055	1		04/30/19 20:49	96-18-4		
1,2,4-Trimethylbenzene	ND	mg/kg	0.0040	0.00038	1		04/30/19 20:49	95-63-6		
1,3,5-Trimethylbenzene	ND	mg/kg	0.0040	0.00025	1		04/30/19 20:49	108-67-8		
Vinyl acetate	ND	mg/kg	0.080	0.0012	1		04/30/19 20:49	108-05-4		
Vinyl chloride	ND	mg/kg	0.0040	0.00025	1		04/30/19 20:49	75-01-4		
Xylene (Total)	ND	mg/kg	0.0080	0.00030	1		04/30/19 20:49	1330-20-7		
Surrogates										
Dibromofluoromethane (S)	113	%.	77-131		1		04/30/19 20:49	1868-53-7		
Toluene-d8 (S)	98	%.	77-127		1		04/30/19 20:49	2037-26-5		
4-Bromofluorobenzene (S)	94	%.	65-119		1		04/30/19 20:49	460-00-4		
Percent Moisture	Analytical Method: SM 2540G									
Percent Moisture	13.7	%	0.10	0.10	1		04/30/19 14:26			
9012 Cyanide, Total	Analytical Method: EPA 9012 Preparation Method: EPA 9012									
Cyanide	ND	mg/kg	0.29	0.16	1	05/02/19 18:20	05/02/19 21:25	57-12-5		

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB-TB1 Lab ID: 50223418007 Collected: 04/29/19 08:00 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	MDL	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV 5035A VOA Analytical Method: EPA 8260									
Acetone	ND	mg/kg	0.10	0.015	1		04/30/19 21:27	67-64-1	
Acrolein	ND	mg/kg	0.10	0.0083	1		04/30/19 21:27	107-02-8	
Acrylonitrile	ND	mg/kg	0.10	0.0023	1		04/30/19 21:27	107-13-1	
Benzene	ND	mg/kg	0.0050	0.00019	1		04/30/19 21:27	71-43-2	
Bromobenzene	ND	mg/kg	0.0050	0.00037	1		04/30/19 21:27	108-86-1	
Bromoform	ND	mg/kg	0.0050	0.00044	1		04/30/19 21:27	74-97-5	
Bromochloromethane	ND	mg/kg	0.0050	0.00038	1		04/30/19 21:27	75-27-4	
Bromodichloromethane	ND	mg/kg	0.0050	0.00065	1		04/30/19 21:27	75-25-2	
Bromoform	ND	mg/kg	0.0050	0.00086	1		04/30/19 21:27	74-83-9	
Bromomethane	ND	mg/kg	0.0050	0.00041	1		04/30/19 21:27	98-06-6	
2-Butanone (MEK)	ND	mg/kg	0.025	0.0032	1		04/30/19 21:27	78-93-3	
n-Butylbenzene	ND	mg/kg	0.0050	0.00032	1		04/30/19 21:27	104-51-8	
sec-Butylbenzene	ND	mg/kg	0.0050	0.00030	1		04/30/19 21:27	135-98-8	
tert-Butylbenzene	ND	mg/kg	0.0050	0.00041	1		04/30/19 21:27		
Carbon disulfide	ND	mg/kg	0.010	0.00028	1		04/30/19 21:27	75-15-0	
Carbon tetrachloride	ND	mg/kg	0.0050	0.00034	1		04/30/19 21:27	56-23-5	
Chlorobenzene	ND	mg/kg	0.0050	0.00028	1		04/30/19 21:27	108-90-7	
Chloroethane	ND	mg/kg	0.0050	0.00048	1		04/30/19 21:27	75-00-3	
Chloroform	ND	mg/kg	0.0050	0.00029	1		04/30/19 21:27	67-66-3	
Chloromethane	ND	mg/kg	0.0050	0.0018	1		04/30/19 21:27	74-87-3	
2-Chlorotoluene	ND	mg/kg	0.0050	0.00033	1		04/30/19 21:27	95-49-8	
4-Chlorotoluene	ND	mg/kg	0.0050	0.00020	1		04/30/19 21:27	106-43-4	
Dibromochloromethane	ND	mg/kg	0.0050	0.00051	1		04/30/19 21:27	124-48-1	
1,2-Dibromoethane (EDB)	ND	mg/kg	0.0050	0.00038	1		04/30/19 21:27	106-93-4	
Dibromomethane	ND	mg/kg	0.0050	0.00043	1		04/30/19 21:27	74-95-3	
1,2-Dichlorobenzene	ND	mg/kg	0.0050	0.00040	1		04/30/19 21:27	95-50-1	
1,3-Dichlorobenzene	ND	mg/kg	0.0050	0.00029	1		04/30/19 21:27	541-73-1	
1,4-Dichlorobenzene	ND	mg/kg	0.0050	0.00035	1		04/30/19 21:27	106-46-7	
trans-1,4-Dichloro-2-butene	ND	mg/kg	0.10	0.00057	1		04/30/19 21:27	110-57-6	
Dichlorodifluoromethane	ND	mg/kg	0.0050	0.00021	1		04/30/19 21:27	75-71-8	
1,1-Dichloroethane	ND	mg/kg	0.0050	0.00028	1		04/30/19 21:27	75-34-3	
1,2-Dichloroethane	ND	mg/kg	0.0050	0.00038	1		04/30/19 21:27	107-06-2	
1,1-Dichloroethene	ND	mg/kg	0.0050	0.00040	1		04/30/19 21:27	75-35-4	
cis-1,2-Dichloroethene	ND	mg/kg	0.0050	0.00036	1		04/30/19 21:27	156-59-2	
trans-1,2-Dichloroethene	ND	mg/kg	0.0050	0.00036	1		04/30/19 21:27	156-60-5	
1,2-Dichloropropane	ND	mg/kg	0.0050	0.00029	1		04/30/19 21:27	78-87-5	
1,3-Dichloropropane	ND	mg/kg	0.0050	0.00040	1		04/30/19 21:27	142-28-9	
2,2-Dichloropropane	ND	mg/kg	0.0050	0.00024	1		04/30/19 21:27	594-20-7	
1,1-Dichloropropene	ND	mg/kg	0.0050	0.00024	1		04/30/19 21:27	563-58-6	
cis-1,3-Dichloropropene	ND	mg/kg	0.0050	0.00032	1		04/30/19 21:27	10061-01-5	
trans-1,3-Dichloropropene	ND	mg/kg	0.0050	0.00031	1		04/30/19 21:27	10061-02-6	
Ethylbenzene	ND	mg/kg	0.0050	0.00024	1		04/30/19 21:27	100-41-4	
Ethyl methacrylate	ND	mg/kg	0.10	0.00079	1		04/30/19 21:27	97-63-2	
Hexachloro-1,3-butadiene	ND	mg/kg	0.0050	0.00028	1		04/30/19 21:27	87-68-3	
2-Hexanone	ND	mg/kg	0.10	0.0038	1		04/30/19 21:27	591-78-6	
Iodomethane	ND	mg/kg	0.10	0.00038	1		04/30/19 21:27	74-88-4	

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

ANALYTICAL RESULTS

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Sample: SB-TB1 Lab ID: 50223418007 Collected: 04/29/19 08:00 Received: 04/30/19 08:25 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report					CAS No.	Qual	
			Limit	MDL	DF	Prepared	Analyzed			
8260 MSV 5035A VOA	Analytical Method: EPA 8260									
Isopropylbenzene (Cumene)	ND	mg/kg	0.0050	0.00033	1		04/30/19 21:27	98-82-8		
p-Isopropyltoluene	ND	mg/kg	0.0050	0.00034	1		04/30/19 21:27	99-87-6		
Methylene Chloride	ND	mg/kg	0.020	0.0015	1		04/30/19 21:27	75-09-2		
4-Methyl-2-pentanone (MIBK)	ND	mg/kg	0.025	0.0035	1		04/30/19 21:27	108-10-1		
Methyl-tert-butyl ether	ND	mg/kg	0.0050	0.00050	1		04/30/19 21:27	1634-04-4		
Naphthalene	ND	mg/kg	0.0050	0.00082	1		04/30/19 21:27	91-20-3		
n-Propylbenzene	ND	mg/kg	0.0050	0.00028	1		04/30/19 21:27	103-65-1		
Styrene	ND	mg/kg	0.0050	0.00033	1		04/30/19 21:27	100-42-5		
1,1,1,2-Tetrachloroethane	ND	mg/kg	0.0050	0.00041	1		04/30/19 21:27	630-20-6		
1,1,2,2-Tetrachloroethane	ND	mg/kg	0.0050	0.00077	1		04/30/19 21:27	79-34-5		
Tetrachloroethylene	ND	mg/kg	0.0050	0.00034	1		04/30/19 21:27	127-18-4		
Toluene	ND	mg/kg	0.0050	0.00050	1		04/30/19 21:27	108-88-3		
1,2,3-Trichlorobenzene	ND	mg/kg	0.0050	0.00034	1		04/30/19 21:27	87-61-6		
1,2,4-Trichlorobenzene	ND	mg/kg	0.0050	0.00056	1		04/30/19 21:27	120-82-1		
1,1,1-Trichloroethane	ND	mg/kg	0.0050	0.00029	1		04/30/19 21:27	71-55-6		
1,1,2-Trichloroethane	ND	mg/kg	0.0050	0.00055	1		04/30/19 21:27	79-00-5		
Trichloroethylene	ND	mg/kg	0.0050	0.00025	1		04/30/19 21:27	79-01-6		
Trichlorofluoromethane	ND	mg/kg	0.0050	0.00027	1		04/30/19 21:27	75-69-4		
1,2,3-Trichloropropane	ND	mg/kg	0.0050	0.00069	1		04/30/19 21:27	96-18-4		
1,2,4-Trimethylbenzene	ND	mg/kg	0.0050	0.00048	1		04/30/19 21:27	95-63-6		
1,3,5-Trimethylbenzene	ND	mg/kg	0.0050	0.00031	1		04/30/19 21:27	108-67-8		
Vinyl acetate	ND	mg/kg	0.10	0.0015	1		04/30/19 21:27	108-05-4		
Vinyl chloride	ND	mg/kg	0.0050	0.00031	1		04/30/19 21:27	75-01-4		
Xylene (Total)	ND	mg/kg	0.010	0.00038	1		04/30/19 21:27	1330-20-7		
Surrogates										
Dibromofluoromethane (S)	113	%.	77-131		1		04/30/19 21:27	1868-53-7		
Toluene-d8 (S)	96	%.	77-127		1		04/30/19 21:27	2037-26-5		
4-Bromofluorobenzene (S)	94	%.	65-119		1		04/30/19 21:27	460-00-4		

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,

without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

QUALITY CONTROL DATA

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

QC Batch: 497670 Analysis Method: EPA 6020

QC Batch Method: EPA 3050B Analysis Description: 6020 MET

Associated Lab Samples: 50223418001, 50223418002, 50223418003, 50223418004, 50223418005, 50223418006

METHOD BLANK: 2295853 Matrix: Solid

Associated Lab Samples: 50223418001, 50223418002, 50223418003, 50223418004, 50223418005, 50223418006

Parameter	Units	Blank	Reporting		MDL	Analyzed	Qualifiers
		Result	Limit				
Cadmium	mg/kg	ND	0.049	0.041	05/01/19 07:27		
Chromium	mg/kg	ND	0.20	0.10	05/01/19 07:27		
Nickel	mg/kg	ND	0.049	0.030	05/01/19 07:27		

LABORATORY CONTROL SAMPLE: 2295854

Parameter	Units	Spike	LCS	LCS	% Rec	Qualifiers
		Conc.	Result	% Rec	Limits	
Cadmium	mg/kg	3.9	3.9	100	80-120	
Chromium	mg/kg	3.9	4.0	104	80-120	
Nickel	mg/kg	3.9	4.0	103	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2295855 2295856

Parameter	Units	MS	MSD	MS	MSD	MS	MSD	% Rec	% Rec	Max	
		50223418002	Spike	Spike	Result	Result	Result	RPD	RPD	RPD	Qual
Cadmium	mg/kg	0.14	4.5	4.5	4.3	4.3	94	94	75-125	1	20
Chromium	mg/kg	15.5	4.5	4.5	24.6	24.8	207	210	75-125	1	20 M3
Nickel	mg/kg	16.3	4.5	4.5	23.3	23.4	158	160	75-125	1	20 M3

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,

without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

QUALITY CONTROL DATA

Project: Amphenol / Franklin Power Prod
 Pace Project No.: 50223418

QC Batch:	497653	Analysis Method:	EPA 8260
QC Batch Method:	EPA 8260	Analysis Description:	8260 MSV 5035A Volatile Organics
Associated Lab Samples:	50223418001, 50223418002, 50223418003, 50223418004, 50223418005, 50223418006, 50223418007		

METHOD BLANK:	2295776	Matrix:	Solid
Associated Lab Samples:	50223418001, 50223418002, 50223418003, 50223418004, 50223418005, 50223418006, 50223418007		

Parameter	Units	Blank Result	Reporting Limit	MDL	Analyzed	Qualifiers
1,1,1,2-Tetrachloroethane	mg/kg	ND	0.0050	0.00041	04/30/19 15:43	
1,1,1-Trichloroethane	mg/kg	ND	0.0050	0.00029	04/30/19 15:43	
1,1,2,2-Tetrachloroethane	mg/kg	ND	0.0050	0.00077	04/30/19 15:43	
1,1,2-Trichloroethane	mg/kg	ND	0.0050	0.00055	04/30/19 15:43	
1,1-Dichloroethane	mg/kg	ND	0.0050	0.00028	04/30/19 15:43	
1,1-Dichloroethene	mg/kg	ND	0.0050	0.00040	04/30/19 15:43	
1,1-Dichloropropene	mg/kg	ND	0.0050	0.00024	04/30/19 15:43	
1,2,3-Trichlorobenzene	mg/kg	ND	0.0050	0.00034	04/30/19 15:43	
1,2,3-Trichloropropane	mg/kg	ND	0.0050	0.00069	04/30/19 15:43	
1,2,4-Trichlorobenzene	mg/kg	ND	0.0050	0.00056	04/30/19 15:43	
1,2,4-Trimethylbenzene	mg/kg	ND	0.0050	0.00048	04/30/19 15:43	
1,2-Dibromoethane (EDB)	mg/kg	ND	0.0050	0.00038	04/30/19 15:43	
1,2-Dichlorobenzene	mg/kg	ND	0.0050	0.00040	04/30/19 15:43	
1,2-Dichloroethane	mg/kg	ND	0.0050	0.00038	04/30/19 15:43	
1,2-Dichloropropane	mg/kg	ND	0.0050	0.00029	04/30/19 15:43	
1,3,5-Trimethylbenzene	mg/kg	ND	0.0050	0.00031	04/30/19 15:43	
1,3-Dichlorobenzene	mg/kg	ND	0.0050	0.00029	04/30/19 15:43	
1,3-Dichloropropane	mg/kg	ND	0.0050	0.00040	04/30/19 15:43	
1,4-Dichlorobenzene	mg/kg	ND	0.0050	0.00035	04/30/19 15:43	
2,2-Dichloropropane	mg/kg	ND	0.0050	0.00024	04/30/19 15:43	
2-Butanone (MEK)	mg/kg	ND	0.025	0.0032	04/30/19 15:43	
2-Chlorotoluene	mg/kg	ND	0.0050	0.00033	04/30/19 15:43	
2-Hexanone	mg/kg	ND	0.10	0.0038	04/30/19 15:43	
4-Chlorotoluene	mg/kg	ND	0.0050	0.00020	04/30/19 15:43	
4-Methyl-2-pentanone (MIBK)	mg/kg	ND	0.025	0.0035	04/30/19 15:43	
Acetone	mg/kg	ND	0.10	0.015	04/30/19 15:43	
Acrolein	mg/kg	ND	0.10	0.0083	04/30/19 15:43	
Acrylonitrile	mg/kg	ND	0.10	0.0023	04/30/19 15:43	
Benzene	mg/kg	ND	0.0050	0.00019	04/30/19 15:43	
Bromobenzene	mg/kg	ND	0.0050	0.00037	04/30/19 15:43	
Bromochloromethane	mg/kg	ND	0.0050	0.00044	04/30/19 15:43	
Bromodichloromethane	mg/kg	ND	0.0050	0.00038	04/30/19 15:43	
Bromoform	mg/kg	ND	0.0050	0.00065	04/30/19 15:43	
Bromomethane	mg/kg	ND	0.0050	0.00086	04/30/19 15:43	
Carbon disulfide	mg/kg	ND	0.010	0.00028	04/30/19 15:43	
Carbon tetrachloride	mg/kg	ND	0.0050	0.00034	04/30/19 15:43	
Chlorobenzene	mg/kg	ND	0.0050	0.00028	04/30/19 15:43	
Chloroethane	mg/kg	ND	0.0050	0.00048	04/30/19 15:43	
Chloroform	mg/kg	ND	0.0050	0.00029	04/30/19 15:43	
Chloromethane	mg/kg	ND	0.0050	0.0018	04/30/19 15:43	
cis-1,2-Dichloroethene	mg/kg	ND	0.0050	0.00036	04/30/19 15:43	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

QUALITY CONTROL DATA

Project: Amphenol / Franklin Power Prod
 Pace Project No.: 50223418

METHOD BLANK: 2295776 Matrix: Solid
 Associated Lab Samples: 50223418001, 50223418002, 50223418003, 50223418004, 50223418005, 50223418006, 50223418007

Parameter	Units	Blank Result	Reporting Limit	MDL	Analyzed	Qualifiers
cis-1,3-Dichloropropene	mg/kg	ND	0.0050	0.00032	04/30/19 15:43	
Dibromochloromethane	mg/kg	ND	0.0050	0.00051	04/30/19 15:43	
Dibromomethane	mg/kg	ND	0.0050	0.00043	04/30/19 15:43	
Dichlorodifluoromethane	mg/kg	ND	0.0050	0.00021	04/30/19 15:43	
Ethyl methacrylate	mg/kg	ND	0.10	0.00079	04/30/19 15:43	
Ethylbenzene	mg/kg	ND	0.0050	0.00024	04/30/19 15:43	
Hexachloro-1,3-butadiene	mg/kg	ND	0.0050	0.00028	04/30/19 15:43	
Iodomethane	mg/kg	ND	0.10	0.00038	04/30/19 15:43	
Isopropylbenzene (Cumene)	mg/kg	ND	0.0050	0.00033	04/30/19 15:43	
Methyl-tert-butyl ether	mg/kg	ND	0.0050	0.00050	04/30/19 15:43	
Methylene Chloride	mg/kg	ND	0.020	0.0015	04/30/19 15:43	
n-Butylbenzene	mg/kg	ND	0.0050	0.00032	04/30/19 15:43	
n-Propylbenzene	mg/kg	ND	0.0050	0.00028	04/30/19 15:43	
Naphthalene	mg/kg	ND	0.0050	0.00082	04/30/19 15:43	
p-Isopropyltoluene	mg/kg	ND	0.0050	0.00034	04/30/19 15:43	
sec-Butylbenzene	mg/kg	ND	0.0050	0.00030	04/30/19 15:43	
Styrene	mg/kg	ND	0.0050	0.00033	04/30/19 15:43	
tert-Butylbenzene	mg/kg	ND	0.0050	0.00041	04/30/19 15:43	
Tetrachloroethene	mg/kg	ND	0.0050	0.00034	04/30/19 15:43	
Toluene	mg/kg	ND	0.0050	0.00050	04/30/19 15:43	
trans-1,2-Dichloroethene	mg/kg	ND	0.0050	0.00036	04/30/19 15:43	
trans-1,3-Dichloropropene	mg/kg	ND	0.0050	0.00031	04/30/19 15:43	
trans-1,4-Dichloro-2-butene	mg/kg	ND	0.10	0.00057	04/30/19 15:43	
Trichloroethene	mg/kg	ND	0.0050	0.00025	04/30/19 15:43	
Trichlorofluoromethane	mg/kg	ND	0.0050	0.00027	04/30/19 15:43	
Vinyl acetate	mg/kg	ND	0.10	0.0015	04/30/19 15:43	
Vinyl chloride	mg/kg	ND	0.0050	0.00031	04/30/19 15:43	
Xylene (Total)	mg/kg	ND	0.010	0.00038	04/30/19 15:43	
4-Bromofluorobenzene (S)	%.	93	65-119		04/30/19 15:43	
Dibromofluoromethane (S)	%.	111	77-131		04/30/19 15:43	
Toluene-d8 (S)	%.	99	77-127		04/30/19 15:43	

LABORATORY CONTROL SAMPLE: 2295777

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
1,1,1-Trichloroethane	mg/kg	0.05	0.055	110	72-125	
1,1,2,2-Tetrachloroethane	mg/kg	0.05	0.048	96	70-124	
1,1-Dichloroethene	mg/kg	0.05	0.057	115	70-127	
1,2,4-Trimethylbenzene	mg/kg	0.05	0.053	106	69-117	
1,2-Dibromoethane (EDB)	mg/kg	0.05	0.046	92	77-126	
1,2-Dichloroethane	mg/kg	0.05	0.048	97	72-120	
1,2-Dichloropropane	mg/kg	0.05	0.051	102	77-125	
Benzene	mg/kg	0.05	0.052	105	74-119	
Chlorobenzene	mg/kg	0.05	0.051	102	76-113	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,

without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

QUALITY CONTROL DATA

Project: Amphenol / Franklin Power Prod
 Pace Project No.: 50223418

LABORATORY CONTROL SAMPLE: 2295777

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chloroform	mg/kg	0.05	0.052	105	71-117	
cis-1,2-Dichloroethene	mg/kg	0.05	0.054	108	70-122	
Ethylbenzene	mg/kg	0.05	0.052	105	73-118	
Isopropylbenzene (Cumene)	mg/kg	0.05	0.056	112	74-121	
Methyl-tert-butyl ether	mg/kg	0.05	0.042	83	74-131	
Naphthalene	mg/kg	0.05	0.048	96	63-123	
Tetrachloroethene	mg/kg	0.05	0.050	99	70-116	
Toluene	mg/kg	0.05	0.053	105	72-112	
trans-1,2-Dichloroethene	mg/kg	0.05	0.054	108	70-120	
Trichloroethene	mg/kg	0.05	0.049	98	74-120	
Vinyl chloride	mg/kg	0.05	0.049	97	58-133	
Xylene (Total)	mg/kg	0.15	0.16	108	71-119	
4-Bromofluorobenzene (S)	%.			104	65-119	
Dibromofluoromethane (S)	%.			98	77-131	
Toluene-d8 (S)	%.			105	77-127	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2295778 2295779

Parameter	Units	MS 50223418002		MSD Spike		MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	Max RPD	Max RPD	Qual
		Result	Conc.	Spike Conc.	Result								
1,1,1-Trichloroethane	mg/kg	ND	0.04	0.04	0.044	0.046	108	113	48-141	4	20		
1,1,2,2-Tetrachloroethane	mg/kg	ND	0.04	0.04	0.043	0.042	108	103	14-173	4	20		
1,1-Dichloroethene	mg/kg	ND	0.04	0.04	0.047	0.046	118	114	43-151	3	20		
1,2,4-Trimethylbenzene	mg/kg	ND	0.04	0.04	0.046	0.045	109	105	10-162	4	20		
1,2-Dibromoethane (EDB)	mg/kg	ND	0.04	0.04	0.037	0.041	92	100	39-147	9	20		
1,2-Dichloroethane	mg/kg	ND	0.04	0.04	0.041	0.042	102	103	45-135	1	20		
1,2-Dichloropropane	mg/kg	ND	0.04	0.04	0.043	0.044	106	110	41-147	3	20		
Benzene	mg/kg	ND	0.04	0.04	0.043	0.044	107	108	38-144	2	20		
Chlorobenzene	mg/kg	ND	0.04	0.04	0.040	0.041	98	102	30-134	4	20		
Chloroform	mg/kg	ND	0.04	0.04	0.042	0.043	105	108	40-139	2	20		
cis-1,2-Dichloroethene	mg/kg	ND	0.04	0.04	0.044	0.045	108	111	43-136	3	20		
Ethylbenzene	mg/kg	ND	0.04	0.04	0.043	0.043	103	105	23-146	2	20		
Isopropylbenzene (Cumene)	mg/kg	ND	0.04	0.04	0.043	0.044	107	109	22-147	2	20		
Methyl-tert-butyl ether	mg/kg	ND	0.04	0.04	0.031	0.044	76	109	54-151	36	20	R1	
Naphthalene	mg/kg	ND	0.04	0.04	0.035	0.034	85	82	10-129	4	20		
Tetrachloroethene	mg/kg	0.0080	0.04	0.04	0.048	0.051	100	106	25-147	5	20		
Toluene	mg/kg	ND	0.04	0.04	0.044	0.044	107	106	31-144	0	20		
trans-1,2-Dichloroethene	mg/kg	ND	0.04	0.04	0.043	0.043	107	107	41-138	1	20		
Trichloroethene	mg/kg	0.016	0.04	0.04	0.058	0.058	103	104	22-167	1	20		
Vinyl chloride	mg/kg	ND	0.04	0.04	0.039	0.041	97	101	40-150	4	20		
Xylene (Total)	mg/kg	ND	0.12	0.12	0.13	0.13	106	106	20-146	1	20		
4-Bromofluorobenzene (S)	%.						99	100	65-119				
Dibromofluoromethane (S)	%.						100	99	77-131				
Toluene-d8 (S)	%.						103	104	77-127				

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

QUALITY CONTROL DATA

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

QC Batch: 497605 Analysis Method: SM 2540G

QC Batch Method: SM 2540G Analysis Description: Dry Weight/Percent Moisture

Associated Lab Samples: 50223418001, 50223418002, 50223418003, 50223418004, 50223418005, 50223418006

SAMPLE DUPLICATE: 2295558

Parameter	Units	50222697003 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	8.9	13.6	42	5	R1

SAMPLE DUPLICATE: 2295559

Parameter	Units	50223418002 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	10.6	11.0	4	5	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

QUALITY CONTROL DATA

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

QC Batch: 535721 Analysis Method: EPA 9012

QC Batch Method: EPA 9012 Analysis Description: 9012 Cyanide

Associated Lab Samples: 50223418001, 50223418002, 50223418003, 50223418004, 50223418005, 50223418006

METHOD BLANK: 2902175 Matrix: Solid

Associated Lab Samples: 50223418001, 50223418002, 50223418003, 50223418004, 50223418005, 50223418006

Parameter	Units	Blank	Reporting	MDL	Analyzed	Qualifiers
		Result	Limit			
Cyanide	mg/kg	ND	0.25	0.14	05/02/19 21:14	

LABORATORY CONTROL SAMPLE: 2902176

Parameter	Units	Spike	LCS	LCS	% Rec	Qualifiers
		Conc.	Result	% Rec	Limits	
Cyanide	mg/kg	1.2	1.3	104	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 2902177 2902178

Parameter	Units	50223418002 Result	MS	MSD	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	RPD	Max Qual
			Spike Conc.	Spike Conc.								
Cyanide	mg/kg	ND	0.694	0.694	0.78	0.76	99	96	80-120	3	20	

Results presented on this page are in the units indicated by the "Units" column except where an alternate unit is presented to the right of the result.

REPORT OF LABORATORY ANALYSIS



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

QUALIFIERS

Project: Amphenol / Franklin Power Prod
 Pace Project No.: 50223418

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.
 ND - Not Detected at or above adjusted reporting limit.
 TNTC - Too Numerous To Count
 J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
 MDL - Adjusted Method Detection Limit.
 PQL - Practical Quantitation Limit.
 RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.
 S - Surrogate
 1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.
 Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.
 LCS(D) - Laboratory Control Sample (Duplicate)
 MS(D) - Matrix Spike (Duplicate)
 DUP - Sample Duplicate
 RPD - Relative Percent Difference
 NC - Not Calculable.
 SG - Silica Gel - Clean-Up
 U - Indicates the compound was analyzed for, but not detected.
 N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.
 Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.
 TNI - The NELAC Institute.

LABORATORIES

PASI-I Pace Analytical Services - Indianapolis
 PASI-O Pace Analytical Services - Ormond Beach

ANALYTE QUALIFIERS

M3 Matrix spike recovery was outside laboratory control limits due to matrix interferences.
 R1 RPD value was outside control limits.

REPORT OF LABORATORY ANALYSIS

This report shall not be reproduced, except in full,
 without the written consent of Pace Analytical Services, LLC.



Pace Analytical Services, LLC
 7726 Moller Road
 Indianapolis, IN 46268
 (317)228-3100

QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Amphenol / Franklin Power Prod

Pace Project No.: 50223418

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
50223418001	SB1696	EPA 3050B	497670	EPA 6020	497749
50223418002	SB1126	EPA 3050B	497670	EPA 6020	497749
50223418003	SB1516	EPA 3050B	497670	EPA 6020	497749
50223418004	SB1044	EPA 3050B	497670	EPA 6020	497749
50223418005	SB1050	EPA 3050B	497670	EPA 6020	497749
50223418006	SB-FD1	EPA 3050B	497670	EPA 6020	497749
50223418001	SB1696	EPA 8260	497653		
50223418002	SB1126	EPA 8260	497653		
50223418003	SB1516	EPA 8260	497653		
50223418004	SB1044	EPA 8260	497653		
50223418005	SB1050	EPA 8260	497653		
50223418006	SB-FD1	EPA 8260	497653		
50223418007	SB-TB1	EPA 8260	497653		
50223418001	SB1696	SM 2540G	497605		
50223418002	SB1126	SM 2540G	497605		
50223418003	SB1516	SM 2540G	497605		
50223418004	SB1044	SM 2540G	497605		
50223418005	SB1050	SM 2540G	497605		
50223418006	SB-FD1	SM 2540G	497605		
50223418001	SB1696	EPA 9012	535721	EPA 9012	535790
50223418002	SB1126	EPA 9012	535721	EPA 9012	535790
50223418003	SB1516	EPA 9012	535721	EPA 9012	535790
50223418004	SB1044	EPA 9012	535721	EPA 9012	535790
50223418005	SB1050	EPA 9012	535721	EPA 9012	535790
50223418006	SB-FD1	EPA 9012	535721	EPA 9012	535790

REPORT OF LABORATORY ANALYSIS



SAMPLE CONDITION UPON RECEIPT FORM

Date/Time and Initials of

Project #: 50223418

person examining contents: 7L 4-30-19

Courier: FedEx UPS USPS Client Commercial Pace Other

Tracking #:

Custody Seal on Cooler/Box Present: Yes No Seals Intact: Yes No

Packing Material: Bubble Wrap Bubble Bags None Other

Thermometer: 1 2 3 4 5 6 A B C D E F Ice Type: Wet Blue None Samples collected today and on ice: Yes No N/A

Cooler Temperature: 0/0.9 Ice Visible in Sample Containers?: Yes No N/A

(Initial/Corrected) Temp should be above freezing to 6°C If temp. is Over 6°C or under 0°C, was the PM Notified?: Yes No N/A

All discrepancies will be written out in the comments section below.

	Yes	No		Yes	No	N/A
Are samples from West Virginia?		✓	All containers needing acid/base pres. Have been checked?: exceptions: VOA, coliform, LLHg, O&G, and any container with a septum cap or preserved with HCl.			
Document any containers out of temp.			All containers needing preservation are found to be in compliance with EPA recommendation (<2, >9, >12) unless otherwise noted.			✓
USDA Regulated Soils? (ID, NY, WA, OR, CA, NM, TX, OK, AR, LA, TN, AL, MS, NC, SC, GA, FL, or Puerto Rico)		✓	Circle: HNO3 H ₂ SO ₄ NaOH NaOH/ZnAc			
Chain of Custody Present:	✓		Dissolved Metals field filtered?:			✓
Chain of Custody Filled Out:	✓					
Short Hold Time Analysis (<72hr)?:	TC	✓	Headspace Wisconsin Sulfide			✓
Analysis:						
Time 5035A TC placed in Freezer or Short Holds To Lab:			Residual Chlorine Check (SVOC 625 Pest/PCB 608) Residual Chlorine Check (Total/Amenable/Free Cyanide)	Present	Absent	N/A
Rush TAT Requested:	TC	✓	Headspace in VOA Vials (>6mm):			✓
Containers Intact?:	✓		Trip Blank Present?:	✓		
Sample Label (IDs/Dates/Times) Match COC?: Except TCs, which only require sample ID	✓		Trip Blank Custody Seals?:	✓		

Comments: SB 1030 sample containers' time doesn't match COC, time on containers = 1602, Date and ID match COC 21 4-30-19
SB 1044 Sample container IDs on TC vials doesn't match COC, ID on TC vials = SB 1404, Date and Time match COC 21 4-30-19

WO# : 50223418



Sample Container Count

CLIENT: IWM

COC PAGE 1 of 1
COC ID# 2315998Project # 50223418S&S
Bul KitMatrix S/N
Soil/Water
Aqueous

pH <2 pH >9 pH >12

Sample Line Item	G	S	G	H	AG0U	AG1H	AG1U	AG2U	AG3S	WGFU	SP5T	BP1U	BP2N	BP2S	BP2U	BP3B	BP3N	BP3S	BP3U	R			
1												2								3			
2												4								7			
3												2								3			
4												2											
5												2											
6												2											
7																				2			
8																							
9																							
10																							
11																							
12																							

Container Codes

Glass

Plastic / Misc.

DG9B	40mL Na Bisulfate amber vial	AG0U	100mL unpreserved amber glass	BP1A	1 liter NaOH, Asc Acid plastic	BP3U	250mL unpreserved plastic
DG9H	40mL HCL amber voa vial	AG1H	1 liter HCL amber glass	BP1N	1 liter HNO3 plastic	BP3Z	250mL NaOH, Zn Ac plastic
DG9M	40mL MeOH clear vial	AG1S	1 liter H2SO4 amber glass	BP1S	1 liter H2SO4 plastic		
DG9P	40mL TSP amber vial	AG1T	1 liter Na Thiosulfate amber glass	BP1U	1 liter unpreserved plastic	AF	Air Filter
DG9S	40mL H2SO4 amber vial	AG1U	1liter unpreserved amber glass	BP1Z	1 liter NaOH, Zn, Ac	C	Air Cassettes
DG9T	40mL Na Thio amber vial	AG2N	500mL HNO3 amber glass	BP2A	500mL NaOH, Asc Acid plastic	R	Terra core kit
DG9U	40mL unpreserved amber vial	AG2S	500mL H2SO4 amber glass	BP2N	500mL HNO3 plastic	SP5T	120mL Coliform Na Thiosulfate
VG9H	40mL HCL clear vial	AG2U	500mL unpreserved amber glass	BP2O	500ml NaOH plastic	U	Summa Can
VG9T	40mL Na Thio, clear vial	AG3S	250mL H2SO4 glass amber	BP2S	500ml H2SO4 plastic	ZPLC	Ziploc Bag
VG9U	40mL unpreserved clear vial	AG3U	250mL unpreserved amber glass	BP2U	500ml unpreserved plastic		
VGFX	40mL w/hexane wipe vial	BG1H	1 liter HCL clear glass	BP2Z	500ml NaOH, Zn Ac		
VSG	Headspace septa vial & HCL	BG1S	1 liter H2SO4 clear glass	BP3B	250ml NaOH plastic		
WGKU	8oz unpreserved clear jar	BG1T	1 liter Na Thiosulfate clear glass	BP3N	250ml HNO3 plastic		
WGFU	4oz clear soil jar	BG1U	1 liter unpreserved glass	BP3S	250ml H2SO4 plastic		
JQFU	4oz unpreserved amber wide	BG3H	250mL HCl Clear Glass				
		BG3U	250mL Unpreserved Clear Glass				

EMANUEL, DONNA

From: Brad Gentry <bgentry@iwmconsult.com>
Sent: Thursday, May 02, 2019 2:09 PM
To: NADDY, JOHN
Subject: RE: Franklin Power Products, Inc./Amphenol Corp. Facility

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

I understand John. I knew you had to see the data before you could issue final approval. Just thought about trying to get jump on it to help keep things moving forward. As of now, we have VOC, cadmium, total chromium, and nickel results but the cyanide results will not be available until tomorrow.

The soil should be non-hazardous so we do not want to take it out as hazardous. Thanks for the reply and insight. We will have something to you early tomorrow to review. Thanks

Sincerely,

Bradley E. Gentry, LPG
Vice President/Brownfield Coordinator
IWM Consulting Group, LLC
7428 Rockville Road
Indianapolis, IN 46214
Mobile: (317) 435-8877
Office: (317) 968-9256
Fax: (317) 347-9326

From: NADDY, JOHN <JNADDY@idem.IN.gov>
Sent: Thursday, May 02, 2019 6:19 AM
To: Brad Gentry <bgentry@iwmconsult.com>
Subject: RE: Franklin Power Products, Inc./Amphenol Corp. Facility

Brad-

The “contained-in” review is based upon the analytical data. I cannot preapprove a “contained-in” request. If you want to submit the request prior to submitting the analytical data, I can look at it, but no decisions will be made prior to receiving and reviewing the analytical data.

If there is pressure to remove the containers of waste and you cannot wait for the “contained-in” determination, the contaminated soil could be manifested offsite as a hazardous waste.



John Naddy
Compliance Branch | Office of Land Quality
Indiana Department of Environmental Management

(317) 233-0404 | jnaddy@idem.IN.gov

From: Brad Gentry [<mailto:bgentry@iwmconsult.com>]
Sent: Wednesday, May 01, 2019 5:29 PM

To: NADDY, JOHN <JNADDY@idem.IN.gov>
Subject: RE: Franklin Power Products, Inc./Amphenol Corp. Facility

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

John

Good afternoon. Following up to our discussion last week, IWM Consulting has 5 roll-off boxes of containerized soil generated during a sewer replacement project (completed on Monday April 29, 2019) for the above referenced site. The waste characterization results should be in our hands this Friday - one sample from each roll off box. Given the high profile nature of this project, we are getting pressure to remove the containerized waste ASAP and would like to get the material transported offsite next Monday if at all possible.

With that being said, is there anyway we can help expedite the review and approval process for IDEM regarding the remediation derived waste contained in request we will be submitting? Can we submit the request prior to receiving the lab reports and then send you the laboratory data immediately upon receipt on Friday? Would this help expedite anything or am I just trying to make things more complicated? Alternatively, can we use the existing IDW contained in approval letter to remove the waste since this was an emergency repair?

Please call me to discuss or email back your thoughts regarding this request/issue. Thank you and I look forward to hearing from you soon.

Sincerely,

Bradley E. Gentry, LPG
Vice President/Brownfield Coordinator
IWM Consulting Group, LLC
7428 Rockville Road
Indianapolis, IN 46214
Mobile: (317) 435-8877
Office: (317) 968-9256
Fax: (317) 347-9326

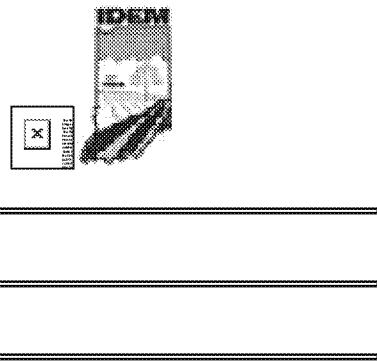
From: EMANUEL, DONNA <DEMANUEL@idem.IN.gov>
Sent: Wednesday, February 27, 2019 12:26 PM
To: Brad Gentry <bgentry@iwmconsult.com>
Cc: NADDY, JOHN <JNADDY@idem.IN.gov>; Davis, Kevin <KDavis2@idem.IN.gov>; Chris Parks <cparks@iwmconsult.com>
Subject: Franklin Power Products, Inc./Amphenol Corp. Facility

Dear Mr. Gentry,

Attached is the "Amended Contained-In" that Mr. John Naddy prepared for **Franklin Power Products, Inc./Amphenol Corporation Facility** which is located at **980 Hurricane Road, Franklin, Johnson County, Indiana** for your review. Once you have received this email would you please respond back to me (via e-mail) that you have received the document for our records.

Thank you

Donna Emanuel
Administrative Assistant | Office of Land Quality
Indiana Department of Environmental Management



(317) 234-6923 | demanuel@idem.in.gov

